TSD File Inventory Index

Date: August 19, 2003

Initial: CMenendez

Facility Name: Williams Ethanol Services, Inc. (One Folder Site)

Facility Identification Number: ILD005075908

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment		**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments		**C.2 Compliance/Enforcement** C.2	1
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
DE-9J

JUL 11 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steve Antonacci
Environmental, Health & Safety Manager
Williams Ethanol Services, Incorporated
1300 South 2nd Street
Pekin, Illinois 61554

Re: Notice of Violation
Williams Ethanol Services, Incorporated
ILD 005 075 908

Dear Mr. Antonacci:

The United States Environmental Protection Agency (U.S. EPA), Region 5, Enforcement and Compliance Assurance Branch received your submittal, dated June 28, 2001, concerning the Notice of Violation (NOV) dated May 25, 2001. U.S. EPA believes your submittal adequately addresses the violations in the NOV.

Thank you for your cooperation in this matter. If you have any questions, please contact Howard Caine, of my staff, at (312) 353-9685.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

cc: Todd Marvel, IEPA
John Tripses, IEPA

CERTIFICATE OF MAILING

I, Brenda Engram, do hereby certify that a Notice of Violation Close-out Letter was sent by Certified Mail, Return Receipt Requested, to:

Steve Antonacci
Environmental, Health & Safety Manager
Williams Ethanol Services, Incorporated
1300 South 2nd Street
Pekin, Illinois 61554

I also certify that a copy of the Notice of Violation Close-out Letter was sent by first class mail to:

Todd Marvel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

John Tripses
Illinois Environmental Protection Agency
5415 North University Avenue
Peoria, Illinois 61614

on the 11th day of July, 2001.

Brenda Engram

Brenda Engram, Secretary
ECAB, Compliance Section 1

CERTIFIED MAIL RECEIPT NUMBER: 7099 3400 0000 9596 7752

CERTIFIED MAIL

28 June, 2001

ENERGY SERVICES - Ethanol
1300 South 2nd Street
P.O. Box 10
Pekin, Illinois 61555-0010
309/347-9200
309/347-3800 fax

Howard Caine
U.S. Environmental Protection Agency
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

RE: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILD 005 075 908

Dear Mr. Caine,

This letter submitted as a timely response to the Notice of Violation dated May 25, 2001 ("NOV") Williams Ethanol Services, Inc. ("WESI") received from the United States Environmental Protection Agency (USEPA) on June 1, 2001. In that letter, USEPA advises WESI of potential violations of state and federal requirements applicable to Generators of Hazardous Wastes, Universal Waste Management, and the Management of Used Oil set forth at 40 CFR Parts 262, 273 and 279, respectively.

WESI appreciates the opportunity to demonstrate its commitment to compliance with state and federal regulations in a timely manner. Moreover, this response will support that commitment by providing information that WESI had, in fact, already corrected most of the potential violations cited, prior to receiving the NOV as indicated below by bold asterisk.

1. ***"Williams' hazardous waste storage room was not equipped with a communication device, fire extinguishers and with water at adequate volume and pressure to control a fire."***

   Comment
   WESI does not refute the allegation that this "storage room" was not adequately equipped in relation to controlling a fire. However, it would be incorrect to state that the storage room is utilized to store hazardous waste. At the time of the inspection, this area was posted "Hazardous Materials Recycling Storage Area". This room was and is currently being utilized to store Universal Waste that is destined for recycling.
   Corrective Action
   *WESI has placed an adequate and appropriate type fire extinguisher to control a possible fire.
   Because there is only one egress, WESI believes it impractical to install a permanent communication device inside the storage room. The procedure for handling Universal Waste is being modified to permit only Instrument and Electric Department (I&E), Security and Environmental personnel within the area. This procedure will include a directive for any I&E personnel managing Universal Waste, to have on their person, a portable-plant radio. To avoid any future misunderstanding associated with the use of this room, WESI has modified the posted sign to state: "Universal

Waste Recyclable Materials Storage Area". Additionally, this storage area will be under lock and key in an effort to enhance and maintain the overall conditions at this work area (authorized entry – I&E, Security, and Environmental). (Please also see Attachment 1 – Universal Waste and responses to Items numbered 2 and 3)

2. ***"Williams had no immediate access to an internal alarm or communication device in the hazardous waste storage room."***

   Comment
   WESI does not refute the allegation that this "storage room" did not have an internal alarm or communication device. However, it would be incorrect to state that the storage room is utilized to store or handle hazardous waste. At the time of the inspection, this area was posted "Hazardous Materials Recycling Storage Area." This room was and is currently being utilized to store Universal Waste that is destined for recycling.
   Corrective Action
   *WESI has made appropriate modifications to procedures associated with Universal Waste Management.
   Because there is only one egress, WESI believes it impractical to install a permanent communication device inside the storage room. The procedure for handling Universal Waste is being modified to permit only I&E, Security and Environmental personnel within this area. This procedure will include a directive for any I&E personnel managing Universal Waste, to have on their person, a portable-plant radio (Please also see responses to Items numbered 1 and 3).

3. ***Regarding Emergency Information "Williams did not have any of this information posted by any telephones where the facility would be handling hazardous waste."***

   Comment
   WESI does not refute the allegation that the aforementioned "storage room" did not have posted information in relation to telephone numbers and contacts in case of an emergency. However, it would be incorrect to state that the storage room is utilized to store or handle hazardous waste. At the time of the inspection, this area was posted "Hazardous Materials Recycling Storage Area." This room was and is currently being utilized to store Universal Waste that is destined for recycling.
   Corrective Action
   *WESI has installed appropriate notice that provides pertinent telephone numbers and contacts in case of an emergency (Please also see Attachment 2 – Emergency Information and Items numbered 1 and 2).

4. ***"Williams had a container that was used to store waste from aerosol cans and the container was open at the time of the inspection."***

   Comment
   WESI does not refute the allegation that the aforementioned "container" was open at the time of the inspection to the extent that an aerosol can had not been removed from the container's evacuation device.
   Corrective Action
   *WESI personnel closed the container by removing an aerosol can that had regrettably been left in the evacuation device.

WESI is conducting efforts to reemphasize procedures for evacuating aerosol cans and their proper disposition. The procedure will indicate the significance of evacuating the aerosol can, followed by the empty can's proper disposition and securing the evacuation device.

5. ***"Williams stored lamps in an open bucket and stored lamps in an open box."***

Comment
WESI does not refute the allegation that the aforementioned "lamps" were stored in an open bucket and open box. The lamps stored in the aforementioned "open bucket" contravened WESI's Universal Waste Management procedures. It has been determined that this activity was conducted due to an exhausted box supply (bulb lamps are placed in 4' foot boxes) resulting from an uncharacteristic volume of lamps being upgraded due to remodeling of office space.
Additionally, it has been determined that the aforementioned "open box" was a result of the box not being completely full.
Corrective Action
*WESI personnel filled and closed the box container; WESI ordered container supplies overnight and transferred bulbs from the aforementioned "open bucket" into the appropriate box container.
WESI is modifying Universal Waste Management procedures to include directives that *all containers* of batteries, lamps, broken lamps, and PCB ballast be closed whether full to capacity or being currently used to accumulate Universal Wastes. Additionally, WESI is taking steps to assure that container supplies are adequately maintained (Please also see response to Item No. 6).

6. ***"Williams stored lamps in an open bucket labeled with the words "Recycling Container for Used Batteries"."***

Comment
WESI does not refute the allegation that the aforementioned "lamps" were stored in an open bucket labeled for used batteries. The lamps stored in the aforementioned "open bucket" contravened WESI's Universal Waste Management procedures. It has been determined that this activity was conducted due to an exhausted box supply (bulb lamps are placed in 4' foot boxes) resulting from an uncharacteristic volume of lamps being upgraded due to remodeling of office space.
Corrective Action
*WESI personnel transferred the lamps from the open bucket and into their appropriate 4' box (Please also see response to Item No. 5).

7. ***"Based on Williams' shipping records of universal waste to EVERLights, Williams has accumulated universal waste for longer than one year."***

Comment
It is incorrect to state that Universal Waste at WESI was accumulated for longer than one year. This conclusion is based on Williams' shipping records. Those documents that were reviewed during the inspection were in fact Certification that the materials are being recycled. The dates shown on these Certificates are given when the document is generated. Attached to the Certificate is a pink copy of the Bill Of Lading, which indicates the actual dates for "shipments" out of WESI.

Corrective Action
WESI regretfully acknowledges this fact as a conduit for confusion. WESI is submitting copies of Bills of Lading that will demonstrate compliance in regards to annual accumulations and shipments (See Attachment 3 – Bill Of Lading Copies).

8. ***"Williams had three drums of used oil that were not marked or labeled with the words "Used Oil"."***

Comment
WESI does not refute the allegation that the aforementioned "three drums" were not marked or labeled with the words "Used Oil". Unmarked or unlabeled drums contravened WESI's Used Oil Management procedures.
Corrective Action
*WESI personnel placed "Used Oil" labeling on the "three drums" and reinforced the requirement to do so with personnel associated with generating, transferring and managing used oil drums (Please also see Attachment 4 – Used Oil).
WESI is taking steps to enhance and reinforce the Used Oil Management Procedures.

In view of these facts, WESI respectfully requests that this information be taken into consideration in withdrawing the NOV.
OR
In view of these facts, WESI respectfully proposes the withdrawal of the NOV and requests a meeting with representatives from USEPA in efforts to reach that result.

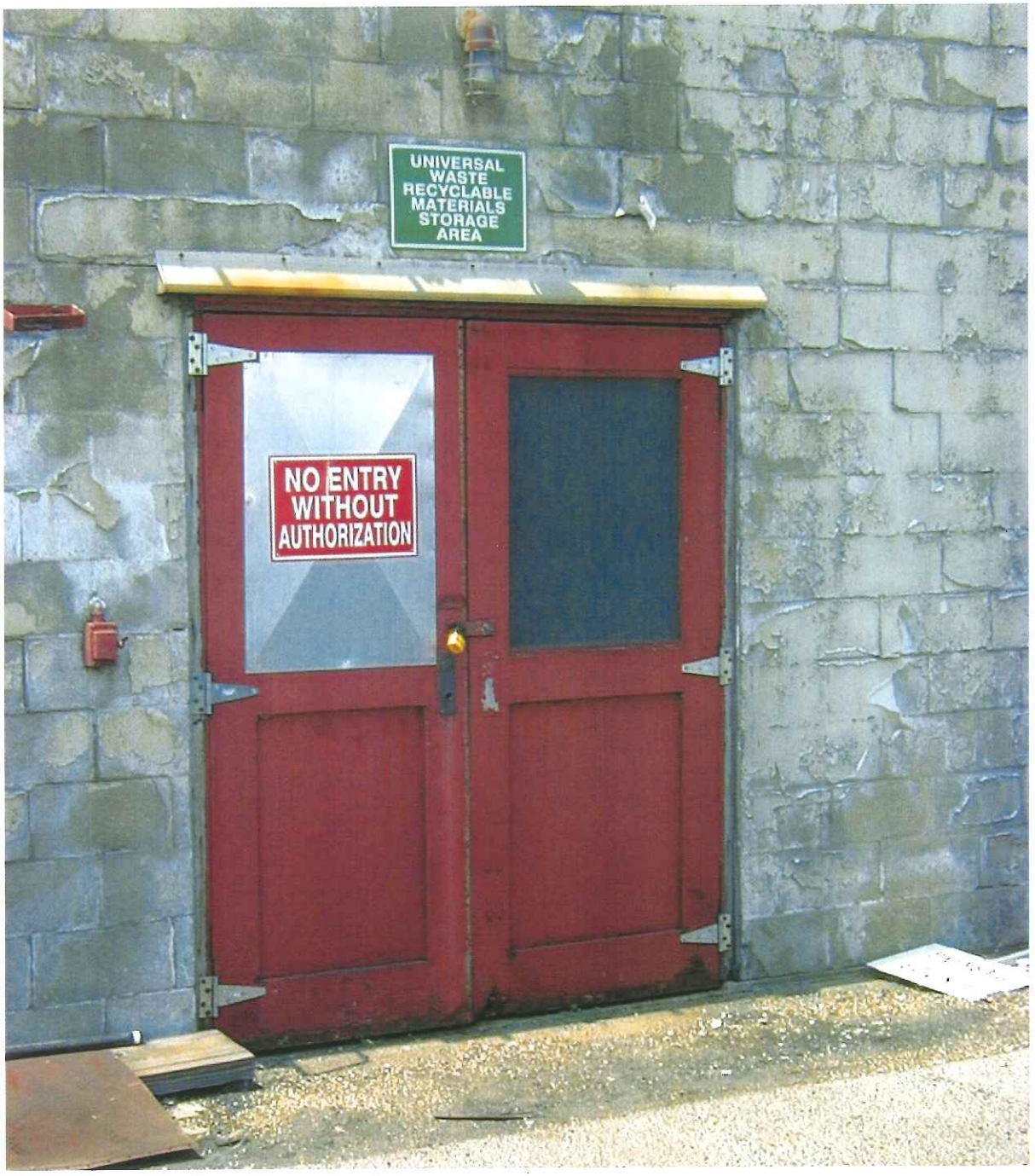
Williams Ethanol Services, Inc. continues its commitment to protecting the public, the environment and our natural resources by operating in a safe and reliable manner. If you require additional information associated with this issue, please do not hesitate to contact either Joseph A. Heredia at (309) 347-9245, or Williams Senior Counsel, Brett Hughes at (918) 573-4270.

Sincerely yours,

Jerry Weiland
Director of Operations

cc: R. Miller
B. Hughes
S. Antonacci
R. Bushue
J. Heredia
S. Dawson

Attachment 1 – Universal Waste



UNIVERSAL WASTE STORAGE AREA
(NEW SIGN D[illegible]SIGNATION)

Attachment 2 – Emergency Information

(EMERGENCY INFORMATION)
POSTED NOTICE & FIRE EXTINGUISHER

Attachment 3 – Bill of Lading Copies

LIGHT CYCLE, INC.

1222 UNIVERSITY AVE. W.
ST. PAUL, MN 55104
PHONE: (651) 641-1309 (800) 274-1309

SPECIAL WASTE SHIPPING DOCUMENT

GENERATOR INFORMATION:

COMPANY: Williams Energy Services, [illegible] (Pekin)	**DATE:** 2-15-99
ADDRESS: 1300 South 2nd Street	**PO #:**
CITY: Pekin **STATE:** IL **ZIP:** 61555	**REF.:** Everlights

UNITS	DESCRIPTION
570	4 FT (4' AND LESS) STRAIGHT FLUORESCENT LAMPS FOR RECYCLING
135	8 FT (GREATER THAN 4') STRAIGHT FLUORESCENT LAMPS FOR RECYCLING
	COMPACT FLUORESCENT LAMPS FOR RECYCLING
	CIRCULAR FLUORESCENT LAMPS FOR RECYCLING
	U BENT FLUORESCENT LAMPS FOR RECYCLING
	HIGH INTENSITY DISCHARGE LAMPS (MERC VAPOR, HPS, METAL HALIDE)
	BROKEN FLUORESCENT LAMPS FOR RECYCLING
	BUILT IN BALLAST FLUORESCENT LAMPS FOR RECYCLING
	SHATTER SHIELD FLUORESCENT LAMPS FOR RECYCLING
	INCANDESCENT LAMPS FOR RECYCLING
	LB. OF NEON TUBING FOR RECYCLING
	LB. OF LIQUID MERCURY FOR RECYCLING
	LB. OF MERCURY SWITCHES OR THERMOMETERS FOR RECYCLING
	LB. OF LEAD ACID BATTERIES (GEL CELLS, CAR BATTERIES) FOR RECYCLING
10	LB. OF ALKALINE BATTERIES (AAA, AA, C, D) FOR RECYCLING
10	LB. NICKEL CADMIUM (IN-CAD) BATTERIES FOR RECYCLING
	LB. MERCURY BATTERIES FOR RECYCLING
5	LB. LITHIUM BATTERIES FOR RECYCLING
	CATHODE RAY TUBES (COMPUTER MONITORS) FOR RECYCLING
	COMPUTER BOXES (HARD DRIVES, POWER SUPPLIES) FOR RECYCLING
	KEYBOARDS FOR RECYCLING
	LB. CIRCUIT BOARDS FOR RECYCLING

	4 FOOT LAMP BOX (4' X 100)		4' LAMP DRUMS (4' X 200)
	8 FOOT LAMP BOX (8' X 30)		UN1A1 METAL DRUMS

CUSTOMER: Joseph A. Hiredin [signature] LIGHT CYCLE, INC. [signature]

CUSTOMER P.O. #______ RECYCLER:______

ALL TECHNICAL AND INVOICING INQUIRES SHOULD BE MADE TO LIGHT CYCLE, INC. (651) 641-1309

FLUORESCENT LAMP BILL OF LADING

RETROFIT RECYCLING, INC.
DB LIGHT CYCLE
1222 UNIVERSITY AVE.
ST. PAUL, MN 55104
(651) 641-1309
(800) 274-1309

ORDER DATE: 12/3/99
SALESPERSON: Dan Harrington
BOL# L5290
EVERLIGHTS

BILL TO:
EVERLIGHTS

PICK UP ADDRESS:
Williams Ethanol Services
1300 South 2nd Street
Pekin, IL 61554
ATTN: Joe Heredia 309-347-9245
INFO:

CUSTOMER P.O.# TERMS: NET 15 SHIP DATE: 12-9-99

	DESCRIPTION	ORDERED	SHIPPED
/R-1001	4' & UNDER FLUORESCENT LAMP		510
/R-1002	OVER 4' FLUORESCENT LAMP		165
/R-1003	COMPACT FLUORESCENT LAMP		
/R-1004	CIRCULAR FLUORESCENT LAMP		
/R-1005	HIGH INTENSITY DISCHARGE (HID)		
/R-1006	SHATTER-SHIELD LAMP		
/R-1007	U-SHAPED FLUORESCENT LAMPS		
/R-1008	BUILT/IN BALLAST FLUORESCENT LAMP		
/R-1009	INCANDESCENT LAMPS		
/R-1010	CRUSHED FLUORESCENT LAMPS		
/R-1011	BROKEN FLUORESCENT LAMPS		
/1100	LAMP BARRELS - DEPOSITS		
/1100-R	LAMP BARRELS - RETURNED		
/1101	4' LAMP BOXES (4'X100)		
/1102	8' LAMP BOXES (8'X60)		

**Charges will be added if minimum quantity of 100 lamps is not met, RRI driver is made to wait to load or package lamps. All lamps sent to Recyclights, Inc. (Bloomington, MN - Columbus, OH Tallahassee, FL).

Customer: Joseph A. Heredia **Date:** 12/8/99 RRI: _____ RL: _____

Terms: NET 15 (1.5% charge on overdue accounts)

UNIVERSAL WASTE BILL OF LADING

P/U SEE JOE, LEONARD OR STEVE

[illegible]FIT RECYCLING, INC.
DBA: LIGHT CYCLE
2960 YORKTON BLVD. SUITE B
LITTLE CANADA, MN 55117
(651) 766-7422
(800) 274-1309

ORDER DATE: 10/10/2000
SALESPERSON: Dan Harrington

BOL# L6913

BILL TO:
Everlights

PICK UP ADDRESS:
Williams Bio-Energy
1300 South 2nd Street
Pekin, IL 61554
Joe Heredia 309-347-9245
CUSTOMER PO #

DESCRIPTION		ORDERED	SHIPPED
FLUORESCENT LAMPS:			
/R-1001	4' & UNDER FLUORESCENT LAMP		680
/R-1002	OVER 4' FLUORESCENT LAMP		150
/R-1003	COMPACT FLUORESCENT LAMP		
/R-1004	CIRCULAR FLUORESCENT LAMP		
/R-1005	HIGH INTENSITY DISCHARGE (HID)		
/R-1006	SHATTER-SHIELD LAMP		
/R-1007	U-SHAPED FLUORESCENT LAMPS		
[illegible]-1008	BUILT/IN BALLAST FLUORESCENT LAMP		
/R-1009	INCANDESCENT LAMPS		
/R-1010	CRUSHED FLUORESCENT LAMPS		
/R-1011	BROKEN FLUORESCENT LAMPS		#75 est
/1100	LAMP BARRELS - DEPOSITS		
/1100-R	LAMP BARRELS - RETURNED		
/1101	4' LAMP BOXES (4'X100)	6	6
/1102	8' LAMP BOXES (8'X60)	6	6
MERCURY ITEMS			
/2001	LIQUID MERCURY		
/2002	MERCURY ELECTRICAL DEVICES		
/2003	MERCURY COLUMN DEVICES		
/2004	SCIENTIFIC OR MEDICAL DEVICES		
/2005	DENTAL AMALGAMS		
/2007	MERCURY DEBRIS (CLEANUP KITS)		
/R-1012	NEON TUBING FOR RECYCLING		
BATTERIES:			
/2008	ALKALINE BATTERY (AAA - D)		#100 est
/2008-1	ALKALINE BATTERY (6V OR LARGER)		
/2009	NICKEL-CADMIUM BATTERY (Ni-Cad)		
[illegible]010	NICKEL METAL HYDRIDE (Ni-ME)		
/2011	MERCURY, LITHIUM, SILVER BATTERY		
/2012	SEALED LEAD ACID (GELL CELLS)		

Customer: [signature] Date: 10/10/00 RRI: _____ SUP: _____

Terms: NET 15 (1.5% charge on overdue accounts)

UNIVERSAL WASTE BILL OF LADING

RETROFIT RECYCLING, INC.
DBA: LIGHT CYCLE
2960 YORKTON BLVD. SUITE B
LITTLE CANADA, MN 55117
(651) 766-7422
(800) 274-1309
BILL TO:

ORDER DATE: 10/10/2000
SALESPERSON: Dan Harrington

BOL# L6914

PICK UP ADDRESS:
Williams Bio-Energy
1300 South 2nd Street
Pekin, IL 61554
Joe Heredia 309-347-9245
CUSTOMER PO #

DESCRIPTION		ORDERED	SHIPPED
BALLASTS			
/R-PCB	PCB BALLAST RECYCLING		#200 es
/R-DEHP	NON-PCB (DEHP)BALLAST RECYCLING		
/R-NONP	NON-HAZARDOUS BALLAST RECYCLING		
/R-CAP	CAPACITORS (PCB) FOR INCINERATION		
/1103	UN1A2 DRUMS FOR BALLAST SHIPPING	3-PLASTIC 55gal DRUMS	
ELECTRONICS			
/2006	COMPUTER MONITORS (CRT'S)		
/2006-1	COMPUTER COMPONENT ELECTRONICS		

**ALL BALLAST RECYCLING CHARGES ARE PER POUND
**TOTAL WEIGHTS ARE DETERMINED UPON WEIGHING AT RRI FACILITY.

Customer: Joseph D Heredia Date: 10/18/00 RRI:
Terms: NET 15 (1.5% charge on overdue accounts)

UNIVERSAL WASTE BILL OF LADING

PROFIT RECYCLING, INC.
DbA: LIGHT CYCLE
2960 YORKTON BLVD. SUITE B
LITTLE CANADA, MN 55117
(651) 766-7422
(800) 274-1309
BILL TO:

ORDER DATE: 4/3/2001
SALESPERSON: Dan Harrington

BOL# L7645

PICK UP ADDRESS:
Williams Bio-Energy
1300 South 2nd Street
Pekin, IL 61554
Joe Heredia 309-347-9245
CUSTOMER PO #

DESCRIPTION		ORDERED	SHIPPED
FLUORESCENT LAMPS:			
/R-1001	4' & UNDER FLUORESCENT LAMP		760
/R-1002	OVER 4' FLUORESCENT LAMP		90
/R-1003	COMPACT FLUORESCENT LAMP		
/R-1004	CIRCULAR FLUORESCENT LAMP		
/R-1005	HIGH INTENSITY DISCHARGE (HID)		
/R-1006	SHATTER-SHIELD LAMP		
/R-1007	U-SHAPED FLUORESCENT LAMPS		
-1008	BUILT/IN BALLAST FLUORESCENT LAMP		
/R-1009	INCANDESCENT LAMPS		
/R-1010	CRUSHED FLUORESCENT LAMPS		
/R-1011	BROKEN FLUORESCENT LAMPS		
/1100	~~LAMP BARRELS — DEPOSITS~~ DROP-OFF	2 - 55 & 30 gal PLASTIC DRUMS	
/1100-R	~~LAMP BARRELS - RETURNED~~		
/1101	4' LAMP BOXES (4'X100)		
/1102	8' LAMP BOXES (8'X60)		
MERCURY ITEMS			
/2001	LIQUID MERCURY		
/2002	MERCURY ELECTRICAL DEVICES	Lbs	20# est
/2003	MERCURY COLUMN DEVICES		
/2004	SCIENTIFIC OR MEDICAL DEVICES		
/2005	DENTAL AMALGAMS		
/2007	MERCURY DEBRIS (CLEANUP KITS)		
/R-1012	NEON TUBING FOR RECYCLING		
BATTERIES:			
/2008	ALKALINE BATTERY (AAA - D)		40# (est)
/2008-1	ALKALINE BATTERY (6V OR LARGER)		
/2009	NICKEL-CADMIUM BATTERY (Ni-Cad)		40# (est)
010	NICKEL METAL HYDRIDE (Ni-ME)		
/2011	MERCURY, LITHIUM, SILVER BATTERY		
/2012	SEALED LEAD ACID (GELL CELLS)		

Customer: [illegible] Date: 4/11/01 RRI: _____ SUP: _____
Terms: NET 15 (1.5% charge on overdue accounts)

Attachment 4 – Used Oil

NEW OIL DRUM RACK (SECURED FUNNEL ON USED C L DRUM)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
DE-9J

MAY 25 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steve Antonacci
Environmental, Health & Safety Manager
Williams Ethanol Services, Incorporated
1300 South 2nd Street
Pekin, Illinois 61554

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILD 005 075 908

Dear Mr. Antonacci:

On February 22, 2001, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Illinois Environmental Protection Agency (IEPA) inspected Williams Ethanol Services, Incorporated (a.k.a. Williams Bio-Energy), located in Pekin, Illinois (Williams or the facility). The purpose of the inspection was to evaluate the facility's compliance with the Standards Applicable to Generators of Hazardous Waste, the Land Disposal Restrictions (LDR), the Standards for Universal Waste Management and the Standards for the Management of Used Oil set forth at 40 CFR Parts 262, 268, 273 and 279, respectively. Enclosed please find a copy of our inspection report dated April 17, 2001.

Based on the February 22, 2001 inspection, we have determined that Williams is violating the following requirements.

- 40 CFR §270.1(c) [35 IAC 703.121(a)]-Failure to obtain a permit by failing to comply with 40 CFR §262.34(d)(4) [35 IAC 722.134(d)(4)]. 40 CFR §262.34(d)(4) [35 IAC 722.134(d)(4)] requires that a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that the generator complies with the requirements of (a)(2) and (a)(3) of

§262.34 [35 IAC 722.134], the requirements of subpart C of part 265 [725], the requirements of 40 CFR 268.7(a)(5) [35 IAC 728.107(a)(5)]. Subpart C of Part 265 [725], §265.32(a), (b), (c) and (d) [35 IAC 725.132(a), (b), (c) and (d)] requires that all facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below: an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; a device, such as a telephone or a hand-held two-way radio, capable of summoning emergency assistance from local police department, fire departments, or State or local emergency response teams; portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems. **Williams' hazardous waste storage room was not equipped with a communication device, fire extinguishers and with water at adequate volume and pressure to control a fire.**

- 40 CFR §270.1(c) [35 IAC 703.121(a)]-Failure to obtain a permit by failing to comply with 40 CFR §262.34(d)(4) [35 IAC 722.134(d)(4)]. 40 CFR §262.34(d)(4) [35 IAC 722.134(d)(4)] requires that a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that the generator complies with the requirements of (a)(2) and (a)(3) of §262.34 [722.134], the requirements of subpart C of part 265 [725], the requirements of 40 CFR 268.7(a)(5) [35 IAC 728.107(a)(5)]. Subpart C of Part 265 [725], §265.34 [35 IAC 722.134] requires having immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under §265.32 [725.132] whenever hazardous waste is being poured, mixed, spread, or otherwise handled. **Williams had no immediate access to an internal alarm or communication device in the hazardous waste storage room.**

- 40 CFR §270.1(c) [35 IAC 703.121(a)]-Failure to obtain a permit by failing to comply with 40 CFR §262.34(d)(5)(ii)(A), (B) and (C) [35 IAC 722.134(d)(5)(B)(i), (ii) and (iii)]. 40 CFR §262.34(d)(5) [35 IAC 722.134(d)(5)] requires that a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that the generator complies with 40 CFR §262.34(d)(5)(ii) (A), (B) and (C) [35 IAC 722.134(d)(5)(B)(i), (ii) and (iii). 40 CFR §262.34(d)(5)(ii)(A), (B) and (C) [35 IAC 722.134(d)(5)(B)(i), (ii) and (iii) requires that the generator must post the following information next to the telephone: the name and telephone number of the emergency coordinator; location of fire extinguishers and spill control material, and if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm. **Williams did not have any of this information posted by any telephones where the facility would be handling hazardous waste.**

- 40 CFR §270.1(c) [35 IAC 703.121(a)]-Failure to obtain a permit by failing to comply with 40 CFR §262.34(c)(1)(i) [35 IAC 722.134(c)(1)(A)]. 40 CFR §262.34(c)(1)(i) [35 IAC 722.134(c)(1)(A)] requires that a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) [721.133(e)] in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he: complies with §§265.171 [725.271], 265.172 [725.272] and 265.173(a) [725.273(a)] of this chapter. 40 CFR §265.173(a) [35 IAC 725.273(a)] requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. **Williams had a container that was used to store waste from aerosol cans and the container was open at the time of the inspection.** The contents from the can are evacuated into the drum with a puncturing device. No one was adding or removing waste at the time of the inspection. The drum was closed immediately after it was found to be open.

- 40 CFR §273.13(d)(1) [35 IAC 733.113(d)(1)] requires that a small quantity handler of universal waste store lamps in a closed container. **Williams stored lamps in an open bucket and stored lamps in an open box.**

- 40 CFR §273.14(e) [35 IAC 733.114(e)] requires that a small quantity handler of universal waste store lamps in a container that are marked or labeled with the words "Universal Waste-Lamp(s)", "Waste Lamp(s)" or "Used Lamp(s)". **Williams stored lamps in an open bucket labeled with the words "Recycling Container for Used Batteries".**

- 40 CFR 273.15(a) [35 IAC 733.115(a)] requires that a small quantity handler should not store universal waste for greater than one year unless the handler can demonstrate that it was necessary to accumulate for greater than one year. **Based on Williams' shipping records of universal waste to EVERLights, Williams has accumulated universal waste for longer than one year.**

- 40 CFR §279.22(c)(1) [35 IAC 739.122(c)] requires that container of used oil be marked or labeled with the words "Used Oil". **Williams had three drums of used oil that were not marked or labeled with the words "Used Oil".**

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Howard Caine, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. You should also send a copy of your response to Todd Marvel, Illinois Environmental Protection Agency, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276.

If you have any questions regarding this matter feel free to contact Howard Caine of my staff at (312) 353-9685.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Todd Marvel, IEPA
John Tripses, IEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

DATE: APR 17 2001

SUBJECT: Plant Inspection-Williams Ethanol Services, Inc. (ILD 005 075 908), 1300 South 2nd Street, Pekin, Illinois 61554

FROM: Howard Caine, Environmental Scientist
Enforcement and Compliance Assurance Branch, CS 1

THRU: Lorna M. Jereza, P.E., Chief
Enforcement and Compliance Assurance Branch, CS 1

TO: File

Date of Inspection: February 22, 2001

Attendees: Howard Caine, U.S. EPA

John Tripses, Illinois Environmental Protection Agency (IEPA)

Steve Antonacci, Environmental, Health & Safety Manager, Bio-Energy, Williams Ethanol Services, Inc. (Williams)

Purpose of Inspection: The purpose of the inspection was to conduct a Compliance Evaluation Inspection (CEI) at the facility for management of its RCRA regulated waste. The Illinois Environmental Protection Agency (IEPA) was notified and participated in this inspection. The company was given the Small Business Information sheet.

Company Description and Background

Primary Contact:	Steve Antonacci
Phone Number:	(309) 347-9241
Fax Number:	(309) 347-3800
email:	steve.antonacci@williams.com
Web Site:	www.williamsbioenergy.com

Plant Description

The facility is an ethanol and corn wet milling manufacturing plant. Williams Ethanol Services, Inc. (Williams) receives kernel corn as its raw product. The corn is steeped for 24-36 hours. Steeping involves heating sulfur and converting it to sulfur dioxide (SO_2). The SO_2 combines with water and forms sulfonic acid (H_2SO_3). This is what softens the corn for processing. The corn is ground and it separates out into germ, hull, gluten and starch as product. The germ is dried and shipped off-site. The hull is cleaned, dried and

shipped off-site. The gluten is dried and shipped off-site. The starch is processed into sugar and goes to the fermenters. After fermentation, the sugar is distilled into 200 proof alcohol. The alcohol is either used as an industrial grade alcohol or used as a fuel. The alcohol is shipped off-site by rail, truck or barge. Another product after distillation involves yeast production. The yeast is either shipped off-site as a cream or is dried. The facility also produces stillage which is shipped off-site. The plant was built in 1889. Corn Products Corporation (CPC) operated the plant from 1911-1980. CPC/Texaco operated the plant as Pekin Energy from 1981-1995. Williams has operated the plant from 1995 to the present time. The legal name of the company is Williams Ethanol Services, Inc. Its marketing name is Williams Bio-Energy. The plant has 240 employees in Pekin (20,000 corporate wide) and operates 24 hours per day, seven days per week with three operating shifts.

On-site Observations

Mr. Tripses and I arrived on-site and we presented our credentials to Mr. Antonacci and explained the purpose of the inspection. Mr. Antonacci then described the facility operations and gave us a tour of the plant. The facility operations are described above. Prior to touring the plant, Mr. Antonacci described Williams solid waste streams. Williams primarily generates universal wastes (fluorescent bulbs, mercury (Hg) micro switches and PCB ballast), lab wastes (primarily old products), Safety-Kleen Part Washer (SKPW) solvent waste, waste oil (lubricant, pumps and gears), waste antifreeze, vehicle maintenance waste and coal ash. Williams burns 240,000 tpy of coal which produces approximately 24,000 tpy of ash. Williams has two cells on-site where the ash is deposited. The ash is mixed with river water to form a slurry and this slurry is shipped back to the coal mine.

We toured the operations area and Mr. Antonacci explained the unit operations. During our walkthrough, we observed that Williams stores drums in areas where oil is used for the operations. Empty oil drums are left outside near the doorways where the oil is used. These drums are also used to store waste oil when oil is changed. A sticker is placed on the used oil drum when it begins accumulating the used oil. We observed one drum that was closed and labeled with the words "Used Oil". We then went to a Maintenance Area where Williams has used oil storage and a SKPW. No spills were observed from the parts washer. A used oil drum was observed with the words "Used Oil", but was open with a funnel in it. No one was adding oil to it at the time of the inspection.

We then looked at the used oil storage area. This area had a drum of hazardous waste, used oil, oil product, and used grease. This area had drums of used oil that were not labeled and opened (Photos 2-5). Specifically, there were three (3) drums of used oil that were not labeled or marked with the words "Used Oil". I called Mr. Antonacci on April 5, 2001 to clarify if there was a telephone in this area. He stated that there was no telephone, but after looking at the drum marked as hazardous waste it turned out not to be hazardous waste (see conversation record in the attachments).

We next went over to the hazardous waste storage area (Photos 6-11). This room stored waste that would be shipped out and universal waste. Williams had containers of product that would no longer be used, used

flourescent light bulbs, batteries, and ballast. The containers of product that are no longer going to be used had no hazardous waste labels, but the product name could be read on the containers (Photo 6). An open bucket that was to be used for waste batteries, was actually storing used mercury (Hg) bulbs (Photo 9). There was also an open box of bulbs (Photo 11). This room was equipped with a bucket of floor dry, but had no fire extinguishers or communication equipment. Mr. Antonacci stated that some of the operators carried radios. I spoke with Mr. Antonacci on April 5, 2001 and he stated that a fire extinguisher had been installed along with posting a sign that says what to do in case of emergency. He said that no telephone has been installed, but the operators who work in this room should be carrying radios or could use a telephone in the next room (see conversation record in the attachments). I also asked Mr. Antonacci about the "Smoothing Liquid" that was in this room. He stated that Williams is still trying to find a use for this material. If the company can't, then it will be shipped off-site as a waste (see conversation record in the attachments).

Next we went to the facility's garage. The garage had a Safety-Kleen Part Washer and a container that was overflowing with oil filters. No leaks were noted from the part washer.

We then toured the Instrument/Electrical (I/E) Shop. This shop had a Safety-Kleen Part Washer. No leaks were noted from the part washer.

Williams had a drum that was equipped with a device (spray can evacuator) used to puncture and collect waste from aerosol cans (Photos 12-13). When we arrived at the drum, it was opened with no one adding anything to the drum. Mr. Antonacci closed the drum upon our arrival. The spray can evacuator was connected to one of the bungs and the other bung was equipped with a carbon canister. This drum is considered a satellite drum and had an accumulation start date of June 9, 1999. The waste code is F003. According to Mr. Antonacci, the carbon canister on the drum has never been changed.

Williams had one shipment of PCB ballast (30 lb) in 1997; one shipment of Hg bulbs (35 lb) in 1998; one shipment of 510, 4 foot or less flourescent lamps and 165 8 foot lamps in 1999; no shipments in 2000; and one shipment of 75 lb crushed fluorescent lamps, 130 miscellaneous batteries, and 14 lb of PCB-Ballast and a second shipment of 680 4 foot and under fluorescent lamps, 150 above 4 foot fluorescent lamps, 75 lb crushed fluorescent lamps, 100 miscellaneous batteries, and 200 lb PCB-ballast. Everlights is Williams universal waste handler.

Record Review

I reviewed the manifests that were at the facility. The manifests appeared to be filled in completely.

Preparedness and Prevention

The company operates its facility in a manner to minimize the possibility of fire, explosion or any hazardous waste or hazardous waste constituents. The company, however, did not have any communication devices, fire extinguishers, spill equipment or water at adequate volume and pressure for fire control in the hazardous waste storage room. The hazardous waste room did not have an

internal alarm or emergency communication device. The facility did not have the name and number of the emergency coordinator, the location of fire extinguishers and spill control equipment and the number of the fire department posted next to the telephone in any of the areas that have hazardous waste.

Used Oil

Williams uses oil for several processes at the plant. The company stores the used oil in 55 gallon drums. The company does not use the oil for dust suppressant or mixes it with hazardous waste. Three (3) drums were found not to be labeled with the words "Used Oil". I called Mr. Antonacci on April 5, 2001 to see who handled Williams' Used Oil. He stated that Safety-Kleen was the used oil hauler and Safety-Kleen shipped it to one of its oil recycling facilities (see conversation record in the attachments).

Universal Waste

Williams primary waste streams from this plant is universal waste. The company generates ballasts, lamps, and batteries. No broken lamps were observed. No leaking ballasts or batteries were observed. There was a small pail of mercury lamps placed in a bucket labeled "Recycling Container for Used Batteries". There was an open box containing used lamps. The box was labeled "Used Hg Lamps for Recycling". Based on the shipping records, it appears that Williams accumulated universal waste for longer than one (1) year.

Land Disposal Restriction Notices

I reviewed Williams Land Disposal Restriction (LDR) notices. The LDR notices appeared to be filled in completely.

Comments

1) Williams does not have an internal communication device or an alarm system in its Hazardous Waste Storage Room [35 IAC 725.132(a)/40 CFR §262.34(d)(4)].

2) Williams does not have a telephone or other device to summon emergency assistance from local authorities in the Hazardous Waste Storage Room [35 IAC 725.132(b)/40 CFR §262.34(d)(4)].

3) Williams does not have fire extinguishers or fire control equipment in the Hazardous Waste Storage Room [35 IAC 725.132(c)/40 CFR §262.34(d)(4)].

4) Williams does not have water at adequate volume and pressure for fire control [35 IAC 725.132(d)/40 CFR §262.34(d)(4)].

5) Williams does not have immediate access to an internal alarm or other emergency communication device in the Hazardous Waste Room [35 IAC 725.134/40 CFR §262.34(d)(4)].

6) Williams does not have the following information posted next to the telephone areas where hazardous waste is handled: the name and telephone number of the emergency coordinator; the location of the fire extinguishers and spill control equipment and if

present, fire alarms and the number of the fire department [35 IAC 725.134(d)(5)/40 CFR §262.34(d)(5)(ii)(A), (B) and (C).].

7) Williams had an open satellite accumulation drum where spray cans are evacuated into the drum [35 IAC 725.273(a)/ 40 CFR §262.34(d)(2)].

8) Williams had three (3) drums that were not labeled or marked with the words "Used Oil" [35 IAC 739.122(c)/ 40 CFR §279.22(c)(1)].

9) Williams stored lamps in an open bucket and stored lamps in an open box [35 IAC 733.113(d)(1)/40 CFR §273.13(d)(1)].

10) Williams stored lamps in an open bucket that was not labeled "Universal Waste-lamp(s)", "Waste Lamp(s)" or "Used Lamp(s)" [35 IAC 733.114(d)/40 CFR §273.14(e)].

11) Williams appears to have accumulated universal waste for longer than one year based on its shipping records [35 IAC 733.115(a), (b) and (c)/40 CFR §273.15(a), (b) and (c)].

Attachments

Inspection Photographs
RCRA Inspection Report form
Small Quantity Generator Checklist
Used Oil Checklist
Universal Waste Checklist
LDR Inspection Checklist
Universal Waste Recycling Certificates
Safety-Kleen Part Washer forms with LDR
Manifest with LDR
April 5, 2001 Conversation Record

Photo 1: Open drum of Used Oil in Maintenance Area

Photo 2: Unlabeled drum of Used Oil in Drum Storage Area

Photo 3: Open drum of Used Oil in Drum Storage Area

Photo 4: Open drum of Used Oil in Drum Storage Area

Photo 5: Two unlabeled drums of Used Oil

Photo 6: Small containers of no longer usable product

Photo 7: Used Batteries

Photo 8: Containers for Storing Universal Wastes

Photo 9: Open bucket with Used Batteries label storing used lamps

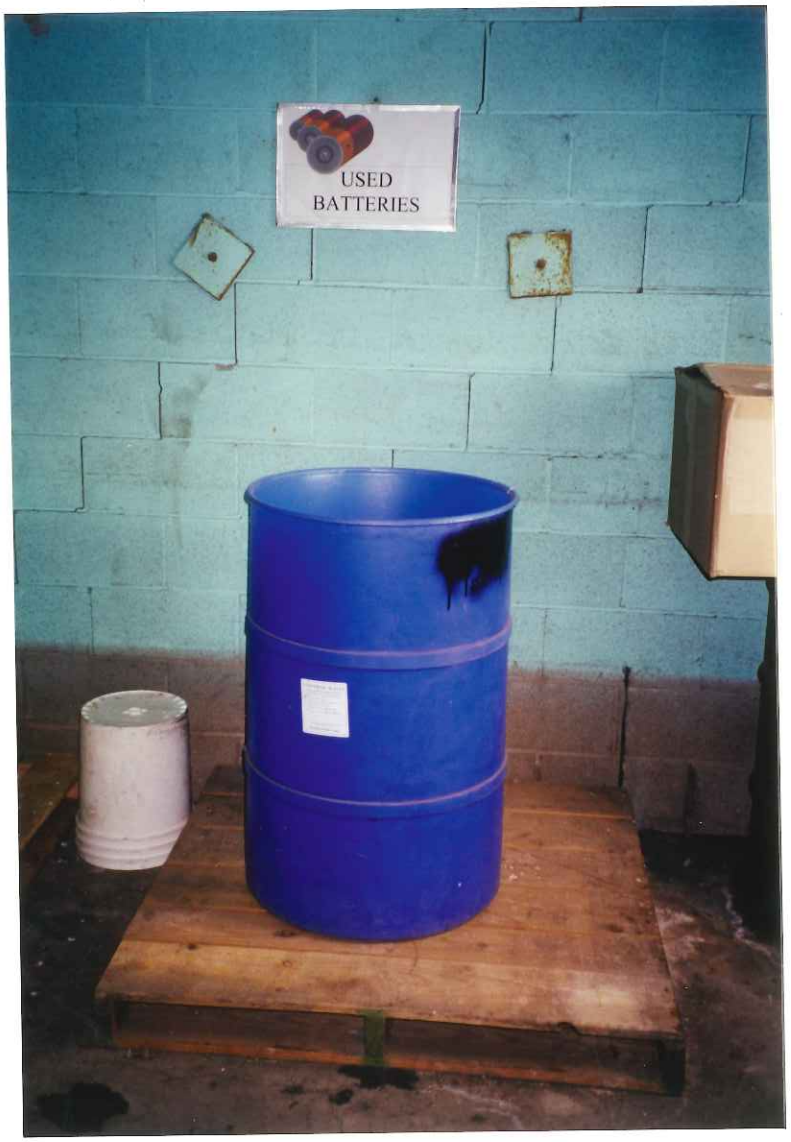


Photo 10: Used Batteries container

Photo 11: Boxes storing used lamps, lower box open

Photo 12: Container used to evacuate spray cans

Photo 13: Container used for evacuating spray cans

bcc: Section Copy
Author's Copy

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	
AUTHOR/ TYPIST	SECTION I CHIEF	ORC STAFF ATTORNEY	ORC SECTION CHIEF	ECAB BRANCH CHIEF	
4/17/01					

WPTD:ECAB:CS1:hhac:4/17/01 c:\epawork\williams\williams.rep.wpd

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D093862811	IEPA #: 1790600011		
Facility Name: WILLIAMS ETHANOL SERVICES (BIOENERGY)	Phone #: (309) 347-9241		
Street Address: 1300 SOUTH 2ND ST.	County:		
City: PEKIN	State: IL	Zip: 61535	
Region:	Inspection Date: 2/22/01	From: ~9:30A	To: ~1:30P
Weather:			

TYPE OF FACILITY

Notified As: SQG	Regulated As: SQG
LDF? (Yes or No) HPV?	90-Day F/U Required?: YES _____ NO _____

TYPE OF INSPECTION

CEI: X Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: ___/___/___ , from (initial) or (subsequent) Notification.

Initial Part A Date: ___/___/___ Amended: ___/___/___

Part A Withdrawal requested: ___/___/___ Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N ___/___/___ Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N ___/___/___

Illinois Attorney General: Y or N ___/___/___ County State's Attorney: Y or N ___/___/___

ORDERS ISSUED

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 19	19	19

OWNER		OPERATOR	
Name	WILLIAMS ETHANOL SERVICES	Name	WILLIAMS ETHANOL SERVICES
Address	1300 SOUTH 2ND STREET	Address	1300 SOUTH 2ND STREET
City	PEKIN	City	PEKIN
State	IL Zip 61555	State	IL Zip 61555
Phone #	(309)347-9247	Phone #	(309)347-9247

PERSON(S) INTERVIEWED	TITLE	PHONE #
STEVE ANTONACCI	ENV. H&S MANAGER	(309)347-9241

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
HOWARD CAINE	USEPA/ENV. SCIENTIST	(312)353-9685
JOHN TRIPSOS	IEPA/CHief, FOS-PEORIA	(309)693-5462

PREPARED BY	AGENCY/TITLE	PHONE #
HOWARD CAINE	USEPA/ENV. SCIENTIST	(312)353-9685

SUMMARY OF APPARENT VIOLATIONS

Area	Class	Section
		725.132(a)
		725.132(b)
		725.132(c)
		725.132(d)
		725.134
		725.134(d)(5)
		725.273(a)
		739.122(c)
		733.113(d)(6)
		733.114(d)
		733.115(a)(b)(c)

Area	Class	Section

Area	Class	Section

Facility Name: WILLIAMS LOGISTICS SERVICES

USEPA #: IL D 0 0 5 0 7 5 9 0 8

IEPA #: L 7 9 0 6 0 5 0 0 2

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19 G F	* 19 G F	* 19 G F	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
UNIVERSAL WASTE	LAMPS, BALLAST BATTERIES					G F	G F	G F			11/18/01	EVOR LIGHTS MINNESOTA
SAFETY-KLEEN PART WASHERS	PART WASHERS					G F	G F	G F			11/11/01	SAFETY-KLEEN PEKIN, IL
LAB PACK	LAB WASTE					G F	G F	G F			7/25/00	HERITAGE, LEMONT, IL
						G F	G F	G F				
USED OIL	PROCESS					G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

Facility Name:

USEPA #: IL _ _ _ _ _ _ _ _ _ _ _ _

IEPA #: _ _ _ _ _ _ _ _ _ _ _ _

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19 ___	* 19 ___	* 19 ___	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

* All "NO" responses must be explained in narrative.

Regulation	RCRA SMALL–QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Small–Quantity Generators of Hazardous Waste (100 – 1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes X No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes X No____ N/A____	
808.121	Has the generator correctly determined if the solid waste it generates is a special waste? Yes X No____ N/A____	808.121
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes X No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes X No____ N/A____	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off–site? Yes X No____ N/A____	722.120(a)
	If "No", proceed to Section 722.120(e).	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes X No____ N/A____	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No____ N/A X	722.120(d)
722.120(e)	Does the generator reclaim waste through a contractual agreement with a recycling facility in which:	722.120(e)
	– the type of waste and frequency of shipments are specified in the agreement? Yes X No____ N/A____	
	– the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? Yes X No____ N/A____	
	– the generator has maintained a copy of the agreement for 3 years after termination or expiration of the agreement? Yes X No____ N/A____	
728.107(a 10)	Has a small–quantity generator with a tolling agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes X No____ N/A____	728.107(a)(10)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	–an Illinois manifest for wastes designated to a facility within Illinois? Yes X No____ N/A____	722.121(a)
722.121(b)	– a manifest from the State to which the manifest is designated? Yes X No____ N/A____	722.121(b)
	– an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A X	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes X No____ N/A____	722.122

Regulation	RCRA SMALL–QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	– signed the certificate by hand? Yes X No ____ N/A ____	722.123(a)
	– obtained the handwritten signature and the date of acceptance by the initial transporter? Yes X No ____ N/A ____	
	– retained one copy as required by Section 722.140(a)? Yes X No ____ N/A ____	
	– apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes X No ____ N/A ____	
722.123(b)	– has the generator apparently given the remaining copies to the transporter? Yes X No ____ N/A ____	722.123(b)
722.123(c)	– has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes ____ No ____ N/A X	722.123(c)
	Subpart C: Pre–Transport Requirements	
	Is there any hazardous waste ready for transport off–site? Yes ____ No ____ N/A X	
	If so, is the generator complying with the pre–transport requirements in Subpart C? Yes ____ No ____ N/A ____	
	Section 722.134: Accumulation Time	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste marking the containers with the words hazardous waste or other words to identify the contents? Yes X No ____ N/A ____	722.134(c)
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes ____ No ____ N/A X	
	If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes ____ No ____ N/A X	
	During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes ____ No ____ N/A X	
722.134(d)	Has the generator complied with the following requirements: Yes ____ No ____ N/A ____	722.134(d)
	Note: If the quantity of hazardous waste on–site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703.	
	Does the facility accumulate hazardous waste in **containers?** Yes X No ____ N/A ____	
	If "No", go to Subpart J.	

Regulation	RCRA SMALL–QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart I: Use and Management of Containers	
(72_ .34a2)	Is the accumulation start date marked on each container? Yes X No____ N/A____	
(722.134a3)	Is each container marked with the words "Hazardous Waste"? Yes X No____ N/A____	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes____ No____ N/A X	
(725.272)	Is the waste compatible with the container and/or liner? Yes X No____ N/A____	
(725.273a)	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes____ No X N/A____	
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes X No____ N/A____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes X No____ N/A____	
	Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes X No____ N/A____	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes X No____ N/A____	
	Does the generator accumulate and/or treat waste in **tanks?** Yes____ No X N/A____	
	Note: If "No", go to Subpart C.	
	COMMENTS:	

Regulation	RCRA SMALL–QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation

Subpart J: Tank Systems

Section 725.301: Generators of 100 to 1000 kg/mo.

(722.134a2) Is each tank marked with the words "Hazardous waste?

Yes_____ No_____ N/A_____

(725.301b1) Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)?

Yes_____ No_____ N/A_____

(725.301b2) Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life?

Yes_____ No_____ N/A_____

(725.301b3) Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard?

Yes_____ No_____ N/A_____

(725.301b4) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by–pass system to a stand–by tank)?

Yes_____ No_____ N/A_____

(725.301c) Is the generator inspecting, where present, the following:

1) discharge control equipment at least once each operating day?

Yes_____ No_____ N/A_____

2) data from monitoring equipment at least once each operating day?

Yes_____ No_____ N/A_____

3) the level of the waste in the tank at least once each operating day?

Yes_____ No_____ N/A_____

4) physical evidence of corrosion at least weekly?

Yes_____ No_____ N/A_____

5) discharge confinement structures to detect erosion or leaking at least weekly?

Yes_____ No_____ N/A_____

(725.301d) Has the generator removed all hazardous waste from tanks and associated equipment and structures upon closure of the facility?

Yes_____ No_____ N/A_____

(725.301e) If ignitable or reactive wastes are stored in tanks, is the generator in compliance with Section 725.301(e)?

Yes_____ No_____ N/A_____

(725.301f) Is the generator in compliance with the regulations concerning incompatible wastes in Section 725.301(f)?

Yes_____ No_____ N/A_____

COMMENTS:

Regulation	RCRA SMALL–QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart C: Preparedness and Prevention	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes X No____ N/A____	
(725.132)	Is the facility equipped with the following if necessary: a) an internal communication or alarm system(s)? Yes____ No X N/A____	IN HW AREA
	b) a telephone or other device to summon emergency assistance from local authorities? Yes____ No X N/A____	
	c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes____ No X N/A____	
	d) water at adequate volume and pressure for fire control? Yes____ No X N/A____	
(725.133)	Is the facility testing and maintaining communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment? Yes X No____ N/A____	BY PART WORKERS
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes____ No X N/A____	
	b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A X	
(725.135)	Is the facility maintaining adequate aisle space? Yes X No____ N/A____	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: – arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes X No____ N/A____	
	– agreements designating the primary authority where more than one police or fire department might respond? Yes X No____ N/A____	
	– agreements with State emergency response teams, contractors and equipment suppliers? Yes X No____ N/A____	
	– arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes X No____ N/A____	
	Section 728.107: Waste Analysis and Recordkeeping	
(728.107a4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes____ No____ N/A X	
	Is the plan on–site? Yes____ No____ N/A____	
	Does the plan include a detailed physical and chemical analysis? Yes____ No____ N/A____	
	Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes____ No____ N/A____	
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off–site? Yes____ No____ N/A____	

Regulation	RCRA SMALL–QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.134(d)(5)	A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures? Yes X No____ N/A____	722.134(d)(5)
	B) Is the following information posted next to the telephone: – the name and telephone number of the emergency coordinator? Yes____ No X N/A____ – the location of fire extinguishers and spill control equipment and, if present, fire alarms? Yes____ No X N/A____ – the number of the fire department unless the facility has a direct alarm? Yes____ No X N/A____	
	C) Have employees received the proper waste handling and emergency procedures training relevant to their positions? Yes X No____ N/A____	
	D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)? Yes____ No____ N/A X	
	Note: A small–quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on–site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).	
	Subpart D: Recordkeeping and Reporting	
	Section 722.140: Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: – a copy of each signed manifest? Yes X No____ N/A____	722.140(a)
722.140(c)	Has the generator retained for a period of 3 years: – copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes X No____ N/A____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes____ No____ N/A X	722.140(d)
	Section 722.142: Exception Reporting	
722.142(b)	Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? Yes____ No____ N/A X	722.142(b)
722.143	**Section 722.143: Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes____ No____ N/A X	722.143
	Subpart E: Exports of Hazardous Waste	
	Is the generator an exporter of hazardous waste? Yes____ No____ N/A X If "Yes", has the generator complied with the requirements of Subpart E? Yes____ No____ N/A____	
	Subpart F: Imports of Hazardous Waste	
	Is the generator an importer of hazardous waste? Yes____ No____ N/A X If "Yes", has the generator complied with the requirements of Subpart F? Yes____ No____ N/A____	

Subpart G: Farmers

Is the generator a farmer?

Yes____ No____ N/A_X_

If "Yes", has the generator complied with the requirements of Subpart G?

Yes____ No____ N/A____

Comments:

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	PART 733: STANDARDS FOR UNIVERSAL WASTE MANAGEMENT	
	SUBPART A: GENERAL	
	Section 733.101 Scope	
733.101	**Note:** This Part provides an alternative set of management standards for batteries (Section 733.102), pesticides (Section 733.103), thermostats (Section 733.104), and lamps (Section 733.105), in lieu of regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	
	Note: Pursuant to Section 733.105, persons managing household hazardous wastes, exempt under subsection 724.104(b)(1), or conditionally exempt small quantity generator wastes, exempt under Section 721.105(g), and are of the same type as universal wastes defined in Section 733.106, may, at their option, manage them under the requirements of this Part.	
	Section 733.102 Applicability -- Batteries	
733.102	**Note:** Spent lead-acid batteries that are managed under Part 726, Subpart G , are not covered under this Part. Generators of batteries as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	Section 733.103 Applicability -- Pesticides	
733.103	**Note:** Pesticides covered under this Part include: 1) recalled stocks of a suspended and canceled pesticide as part of a voluntary or mandatory recall under Section 19(b) of FIFRA; or 2) recalled stocks of a suspended and canceled pesticide as part of a voluntary recall by the registrant for a pesticide not in compliance with FIFRA; or 3) stocks of other unused pesticide products that are collected and managed as part of a waste pesticide collection program. Pesticides not covered under this Part include recalled or unused pesticides that are managed by farmers in compliance with Section 722.170.	
	Section 733.104 Applicability - Mercury Thermostats — NO, [illegible] 3/28/01	
.104	**Note:** Generators of mercury thermostats as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	Section 733.105 Applicability - Lamps	
733.105	**Note:** Generators of lamps as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	SUBPART B: STANDARDS FOR SMALL QUANTITY GENERATORS	
	Section 733.111 Prohibitions	
733.111(a)	Has the small quantity handler refrained from disposing of universal waste? Yes X No _____ N/A _____	
733.111(b)	Has the small quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.117) or managing specific wastes (Section 733.113)? Yes X No _____ N/A _____	733.111(a) _____ 733.111(b)
	Section 733.112 Notification	
733.112	**Note:** A small quantity handler of universal waste means a universal waste handler that does not accumulate 5,000 kilograms or more of universal waste at any time. A small quantity handler of universal waste is not required to notify the Agency of its universal waste handling activities.	

733.113(a)(1)	**Section 733.113 Waste Management** Has the small quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? Yes ~~X~~ None 3/28/01 No _____ N/A X	733.113(a)(1)
733.113(a)(2)	Has each battery cell remained intact and closed while the small quantity handler conducted the activities listed in subsection 733.113(a)(2) (except to remove electrolyte; but must be immediately closed after removal)? Yes ✓ No _____ N/A _____	733.113(a)(2)
Regulation	**RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)**	**Violation**
733.113(a)(3)	Has the small quantity handler that removes electrolyte from batteries or that generates other solid waste as a result of the activities listed in subsection 733.113(a)(2) made a proper hazardous waste determination? Yes _____ No _____ N/A X **Note:** If the electrolyte or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	733.113(a)(3)
733.113(b)	Has the universal waste pesticide(s) been contained in a closed container, an over packed container, a tank meeting the requirements of Part 725, Subpart J (except for 725.297(c) and 725.300), or a transport vehicle or vessel in a way that prevents releases to the environment? Yes _____ No _____ N/A X	733.113(b)
733.113(c)(1)	Has the small quantity handler contained any universal waste mercury thermostat that shows evidence of leakage, spillage, or damage in a proper container? Yes _____ No ~~X~~ None 3/28/01 N/A X	733.113(c)(1)
733.113(c)(2)	Has the small quantity handler followed each of the procedures identified in subsection 733.113(c)(2) when removing mercury-containing ampules form universal waste thermostats? Yes _____ No _____ N/A X	733.113(c)(2)
733.113(c)(3)	Has the small quantity handler that removes mercury-containing ampules from universal waste thermostats or that generates other solid waste as a result of the removal of the ampules made a proper hazardous waste determination for mercury or clean-up residues resulting from spills or leaks or other solid waste generated? Yes _____ No _____ N/A X **Note:** If the mercury, residues, or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	733.113(c)(3)

733.113(d)	Has the small quantity handler of lamps managed them in a manner that prevents releases to the environment as follows:	
733.113(d)(1)	Contained all lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps, and kept such containers and packages closed with no evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? Yes ___ No X N/A ___ 3/28/01	733.113(d)(1)
733.113(d)(2)	Immediately cleaned up and contained any lamp that is broken and placed in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of hazardous constituents. Yes ___ No ___ N/A X	733.113(d)(2)
733.113(d)(3)	treated (by crushing) those lamps only under the following conditions:	733.113(d)(3)
	A) in a closed system where emission of mercury does not exceed 0.1mg/m^3 on the basis of time weighted average over an 8-hour period? Yes ___ No ___ N/A X	
	B) submitted Agency notification of crushing activity quarterly? Yes ___ No ___ N/A X	
	C) immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes ___ No ___ N/A X	
	D) ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels? Yes ___ No ___ N/A X	
	E) ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes ___ No ___ N/A X	
	F) crushed lamps are stored in closed non-leaking containers that are in good condition? Yes ___ No ___ N/A X	

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	Section 733.114 Labeling and Marking	
733.114(a)	Does the small quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)"? Yes X No ___ N/A ___	733.114(a)
733.114(b)	Does the small quantity handler of recalled universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes ___ No ___ N/A X	733.114(b)

733.114(c) Does the small quantity handler of unused universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"?

Yes ______ No ______ N/A __X__

733.114(c)

733.114(d) Does the small quantity handler of universal waste thermostats label or mark each thermostat or container of thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury Thermostat(s)", or "Used Mercury Thermostat(s)"?

Yes [struck out] No [struck out] N/A __X__

3/28/01 3/28/01

733.114(d)

733.114(e) Does the small quantity handler of universal waste lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)"?

Yes [struck out] No __X__ N/A ______

3/28/01 LAMPS STORED IN CONTAINER MARKED BATTERIES, BOX OPEN

733.114(e)

Section 733.115 Accumulation Time Limits

733.115(a) Does a small quantity handler of universal waste accumulate the waste for no longer than one year from the date it was generated or received unless the requirements of subsection 733.115(b) are met?

Yes ______ No __X__ N/A ______

MANIFESTS SHOW 13 MONTHS

733.115(a)

733.115(b) A small quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proof for such activity.

Yes ______ No __X__ N/A ______

733.115(b)

733.115(c) Does the small quantity handler of universal waste demonstrate the length of accumulation time from the date it becomes a waste or is received in accordance with this subsection?

Yes ______ No __X__ N/A ______

733.115(c)

Section 733.116 Employee Training

733.116 Has the small quantity handler of universal waste informed all employees handling or managing universal waste of proper and appropriate handling and emergency procedures?

Yes __X__ No ______ N/A ______

733.116

Section 733.117 Response to Releases

733.117(a) Has the small quantity handler of universal waste immediately contained all releases and residues?

Yes ______ No ______ N/A __X__

733.117(a)

733.117(b) Has the small quantity handler of universal waste made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728?

Yes ______ No ______ N/A __X__

733.117(b)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	Section 733.118 Off-Site Shipments	
733.118(a)	Does the small quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes X No _____ N/A _____	733.118(a)
733.118(b)	If a small quantity handler of universal waste self-transports universal waste off-site, is it done so only in compliance with the transporter requirements of Subpart D (Part 733)? Yes _____ No _____ N/A X	733.118(b)
733.118(c)	Has the small quantity universal waste handler only offered universal waste (that is a USDOT hazardous material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT regulations (49 CFR 172 through 180)? Yes X No _____ N/A _____	733.118(c)
733.118(d)	Does the originating small quantity universal waste handler ensure, prior to shipment, that the receiving handler agrees to receive the shipment? Yes X No _____ N/A _____	733.118(d)
733.118(e)	Does the small quantity handler of universal waste whose shipment of universal waste is rejected by the receiving handler or destination facility either received the waste back or agreed on an alternate destination facility to which the shipment will be sent? Yes _____ No X N/A X 3/25/01	733.118(e)
733.118(f)	If the small quantity handler of universal waste has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes _____ No _____ N/A X	733.118(f)
733.118(g)	If the small quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes _____ No _____ N/A X	733.118(g)
733.118(h)	If the small quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, has the handler managed the waste in compliance with applicable solid waste regulation? Yes _____ No _____ N/A X	733.118(h)
	Section 733.119 Tracking Universal Waste Shipments	
733.119	**Note:** A small quantity handler of universal waste is not required to keep records of shipments of universal waste.	
	Section 733.120 Exports	
.120	Has the small quantity handler of universal waste complied with this section for all exports of universal waste? Yes _____ No _____ N/A X	

		733.120
	SUBPART C: STANDARDS FOR LARGE QUANTITY HANDLERS	
	Section 733.131 Prohibitions	
733.131(a)	Has the large quantity handler refrained from disposing of universal waste? Yes _____ No _____ N/A _____	
733.131(b)	Has the large quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.137) or managing specific wastes (Section 733.133)? Yes _____ No _____ N/A _____	733.131(a)
		733.131(b)
	Section 733.132 Notification	
733.132(a)	Has the large quantity handler of universal waste sent a written notification of universal waste management to the Agency and received a USEPA Identification Number before meeting or exceeding the 5000 kilogram storage limit? Yes _____ No _____ N/A _____ **Note:** A large quantity handler that has already notified the USEPA or Agency of its hazardous waste management activities and received a USEPA Identification Number is not required to renotify. **Note:** A large quantity handler of recalled universal waste pesticides that has sent notification to USEPA or the Agency, as required by 40 CFR 165, is not required to renotify.	733.132(a)
733.132(b)	Does the notification submitted by the large quantity handler of universal waste include the information listed under subsections 733.132(b)(1) through (b)(5)? Yes _____ No _____ N/A _____	733.132(b)
Regulation	**RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)**	**Violation**
	Section 733.133 Waste Management	
733.133(a)(1)	Has the large quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? Yes _____ No _____ N/A _____	733.133(a)(1)
733.133(a)(2)	Has each battery cell remained intact and closed while the large quantity handler conducted the activities listed in subsection 733.133(a)(2) (except to remove electrolyte; but must be immediately closed after removal)? Yes _____ No _____ N/A _____	733.133(a)(2)

733.133(a)(3)	Has the large quantity handler that removes electrolyte from batteries or that generates other solid waste as a result of the activities listed in subsection 733.133(a)(2) made a proper hazardous waste determination? Yes _____ No _____ N/A _____ **Note:** If the electrolyte or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	N/A 733.133(a)(3)
733.133(b)	Has the universal waste pesticide(s) been contained in a closed container, an over packed container, a tank meeting the requirements of Part 725, Subpart J (except for 725.297(c), 725.300, and 725.301) or a transport vehicle or vessel in a way that prevents releases to the environment? Yes _____ No _____ N/A _____	733.133(b)
733.133(c)(1)	Has the large quantity handler contained any universal waste mercury thermostat that shows evidence of leakage, spillage, or damage in a proper container? Yes _____ No _____ N/A _____	733.133(c)(1)
733.133(c)(2)	Has the large quantity handler followed each of the procedures identified in subsection 733.133(c)(2) when removing mercury-containing ampules from universal waste thermostats? Yes _____ No _____ N/A _____	733.133(c)(2)
733.133(c)(3)	Has the large quantity handler that removes mercury-containing ampules from universal waste thermostats or that generates other solid waste as a result of the removal of the ampules made a proper hazardous waste determination for mercury or clean-up residues resulting from spills or leaks or other solid waste generated? Yes _____ No _____ N/A _____ **Note:** If the mercury, residues, or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	733.133(c)(3)
733.133(d)	Has the large quantity handler of lamps managed them in a manner that prevents releases to the environment as follows:	
733.133(d)(1)	Contained all lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps, and kept such containers and packages closed with no evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? Yes _____ No _____ N/A _____	733.133(d)(1)
733.133(d)(2)	Immediately cleaned up and contained any lamp that is broken and placed in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of hazardous constituents. Yes _____ No _____ N/A _____	733.133(d)(2)
733.133(d)(3)	treated (by crushing) those lamps only under the following conditions:	733.133(d)(3)
	A) in a closed system where emission of mercury does not exceed 0.1mg/m^3 on the basis of time weighted average over an 8-hour period? Yes _____ No _____ N/A _____	

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	B) submitted Agency notification of crushing activity quarterly? Yes _____ No _____ N/A _____	
	C) immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes _____ No _____ N/A _____	N/A
	D) ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels? Yes _____ No _____ N/A _____	
	E) ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes _____ No _____ N/A _____	
	F) crushed lamps are stored in closed non-leaking containers that are in good condition? Yes _____ No _____ N/A _____	
	Section 733.134 Labeling and Marking	
733.134(a)	Does the large quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)"? Yes _____ No _____ N/A _____	733.134(a)
733.134(b)	Does the large quantity handler of recalled universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes _____ No _____ N/A _____	733.134(b)
733.134(c)	Does the large quantity handler of unused universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes _____ No _____ N/A _____	733.134(c)
733.134(d)	Does the large quantity handler of universal waste thermostats label or mark each thermostat or container of thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury Thermostat(s)", or "Used Mercury Thermostat(s)"? Yes _____ No _____ N/A _____	733.134(d)
733.134(e)	Does the large quantity handler of universal waste mercury containing lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)"? Yes: _____ No: _____ N/A: _____	733.134(e)
	Section 733.135 Accumulation Time Limits	
733.135(a)	Does a large quantity handler of universal waste accumulate the waste for no longer than one year from the date it was generated or received unless the requirements of subsection 733.135(b) are met? Yes _____ No _____ N/A _____	

		733.135(a)
733.135(b)	A large quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proof for such activity. Yes _____ No _____ N/A _____	733.135(b)
733.135(c)	Does the large quantity handler of universal waste demonstrate the length of accumulation time from the date it becomes a waste or is received in accordance with this subsection? Yes _____ No _____ N/A _____	733.135(c)
	Section 733.136 Employee Training	
733.136	Has the large quantity handler of universal waste ensured that all employees (relative to their responsibilities) are thoroughly familiar with proper universal waste handling and emergency procedures? Yes _____ No _____ N/A _____	733.136
	Section 733.137 Response to Releases	
733.137(a)	Has the large quantity handler of universal waste immediately contained all releases and residues? Yes _____ No _____ N/A _____	733.137(a)
733.137(b)	Has the large quantity handler of universal waste made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728? Yes _____ No _____ N/A _____	733.137(b)
Regulation	**RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)**	**Violation**
	Section 733.138 Off-Site Shipments	
733.138(a)	Does the large quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes _____ No _____ N/A _____	733.138(a)
733.138(b)	If a large quantity handler of universal waste self-transports universal waste off-site, is it done so only in compliance with the transporter requirements of Subpart D (Part 733)? Yes _____ No _____ N/A _____	733.138(b)
733.138(c)	Has the large quantity universal waste handler only offered universal waste (that is a USDOT hazardous material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT regulations (49 CFR 172 through 180)? Yes _____ No _____ N/A _____	733.138(c)
733.138(d)	Does the originating large quantity universal waste handler ensure, prior to shipment, that the receiving handler agrees to receive the shipment? Yes _____ No _____ N/A _____	733.138(d)

733.138(e)	Does the large quantity handler of universal waste whose shipment of universal waste is rejected by the receiving handler or destination facility either received the waste back or agreed on an alternate destination facility to which the shipment will be sent? Yes _____ No _____ N/A _____	733.138(e)
733.138(f)	If the large quantity handler of universal waste has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes _____ No _____ N/A _____	733.138(f)
733.138(g)	If the large quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes _____ No _____ N/A _____	733.138(g)
733.138(h)	If the large quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, has the handler managed the waste in compliance with applicable solid waste regulation? Yes _____ No _____ N/A _____	733.138(h)
	Section 733.139 Tracking Universal Waste Shipments	
733.139(a)	Does the large quantity handler keep a record of each universal waste shipment received at the facility that includes the originating universal waste handler=s name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? Yes _____ No _____ N/A _____	733.139(a)
733.139(b)	Does the large quantity handler keep a record of each shipment of universal waste sent from the handler to other facilities that includes the originating universal waste handler=s name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? Yes _____ No _____ N/A _____ **Note:** The record may take the form of a log, invoice, manifest, bill of lading, or other shipping document.	733.139(b)
733.139(c)(1)	Has the large quantity handler retained the required records for at least three years from the date of receipt of each shipment of universal waste? Yes _____ No _____ N/A _____	733.139(c)(1)
733.139(c)(2)	Has the large quantity handler retained the required records for at least three years from the date each shipment of universal waste left the facility? Yes _____ No _____ N/A _____	733.139(c)(2)
	Section 733.140 Exports	
733.140	Has the large quantity handler of universal waste complied with this section for all exports of universal waste? Yes _____ No _____ N/A _____	

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
		733.140
	SUBPART D: STANDARDS FOR UNIVERSAL WASTE TRANSPORTERS	
733.151(a)(1)	**Section 733.151 Prohibitions** Has the universal waste transporter refrained from disposing of universal waste? Yes _____ No _____ N/A _____	733.151(a)(1)
733.151(a)(2)	Has the universal waste transporter refrained from diluting or treating universal waste, except by responding to releases (Section 733.154) or as provided in subsection 733.151(b)? Yes _____ No _____ N/A _____	733.151(a)(2)
733.151(b)	Has the transporter of universal waste mercury containing lamps treated (by crushing) the lamps only under the following conditions:	733.151(b)
733.151(b)(1)	in a closed system where emission of mercury does not exceed 0.1mg/m^3 on the basis of time weighted average over an 8-hour period? Yes _____ No _____ N/A _____	
733.151(b)(2)	submitted Agency notification of crushing activity quarterly? Yes _____ No _____ N/A _____	
733.151(b)(3)	immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes _____ No _____ N/A _____	
733.151(b)(4)	ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels? Yes _____ No _____ N/A _____	
733.151(b)(5)	ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes _____ No _____ N/A _____	
733.151(b)(6)	crushed lamps are stored in closed non-leaking containers that are in good condition? Yes _____ No _____ N/A _____	
733.152	**Section 733.152 Waste Management** Has the universal waste transporter complied with all applicable USDOT regulations in 49 CFR 171 through 180 for transport of any universal waste that meets the definition of hazardous material in 49 CFR 171.8? Yes _____ No _____ N/A _____	733.152
733.153(a)	**Section 733.153 Accumulation Time Limits** Has the universal waste transporter only stored universal waste at a universal waste transfer facility for ten days or less? Yes _____ No _____ N/A _____ **Note:** If a universal waste transporter stores universal waste for more than ten days, the transporter becomes a universal waste handler and shall comply with Subparts B or C while sorting the universal waste.	733.153(a)

733.154(a)	**Section 733.154 Response to Releases** Has the universal waste transporter immediately contained all releases and residues? Yes _____ No _____ N/A _____	733.154(a)
733.154(b)	Has the universal waste transporter made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code Parts 702 through 705, 720 through 726, and 728? Yes _____ No _____ N/A _____ **Note:** If the waste is determined to be a hazardous waste, the transporter is subject to 35 Ill. Adm. Code Part 722.	733.154(b)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.155(a)	**Section 733.155 Off-Site Shipments** Does the universal waste transporter only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes _____ No _____ N/A _____	733.155(a)
733.155(b)	If the universal waste transporter ships off-site hazardous material as defined under 49 CFR 171.8, has the shipment been properly described on the shipping paper in accordance with 49 CFR Part 172 (USDOT regulations)? Yes _____ No _____ N/A _____	733.155(b)
733.156	**Section 733.156 Exports** Has the universal waste transporter complied with this section for all exports of universal waste? Yes _____ No _____ N/A _____	733.156
	SUBPART E: STANDARDS FOR DESTINATION FACILITIES	
733.160	**Section 733.160 Applicability** **Note:** The owner or operator of a destination facility is subject to all applicable requirements of Parts 702 through 705, 720 through 726, and 728, and the notification requirement under Section 3010 of RCRA. However, a destination facility that recycles a universal waste without storing that waste before it is recycled shall comply with Section 721.106(c)(2).	
733.161(a)	**Section 733.161 Off-Site Shipments** Does destination facility only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes _____ No _____ N/A _____	733.161(a)
733.161(b)	If the destination facility has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes _____ No _____ N/A _____	

		733.161(b)
733.161(c)	If the destination facility has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes _____ No _____ N/A _____	733.161(c)
733.161(d)	If the destination facility receives a shipment of non-hazardous, non-universal waste, has the facility managed the waste in compliance with applicable solid waste regulation? Yes _____ No _____ N/A _____	733.161(d)
	Section 733.162 Tracking Universal Waste Shipments	
733.162(a)	Does the destination facility keep a record of each universal waste shipment received at the facility that includes the originating universal waste handler=s name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? Yes _____ No _____ N/A _____	733.162(a)
733.162(b)	Does the destination facility retain the records described in subsection (a) above for at least three years from the date of receipt of each shipment? Yes _____ No _____ N/A _____	733.162(b)
	SUBPART F: IMPORT REQUIREMENTS	
.170	**Section 733.170 Imports** Have persons managing universal waste that is imported from a foreign country complied with the applicable requirements of Part 733 immediately after the waste enters the US? Yes _____ No _____ N/A _____	733.170

TM:jab\733UWR.doc

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Part 739: Standards for the Management of Used Oil	
	Subpart B: Applicability	
	Note: Used oil not exceeding any specification level of Section 739.111 is subject only to Sections 739.172, 739.173 and 739.174(b).	
	Section 739.112: Prohibitions	
739.112(a)	a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 or 725? Yes____ No____ N/A X	739.112(a)
739.112(b)	b) Is used oil being used as a dust suppressant? Yes____ No X N/A____	739.112(b)
739.112(c)	c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? Yes____ No____ N/A X	739.112(c)
	Subpart C: Standards for Used Oil Generators	
	Section 739.121: Hazardous Waste Mixing	
739.121(a)	Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? Yes____ No X N/A____	739.121(a)
739.121(b)	If "Yes", is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? Yes____ No____ N/A____	739.121(b)
	Section 739.122: Used Oil Storage	
739.122(a)	Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes X No____ N/A____	739.122(a)
739.122(b)	Are containers and aboveground tanks used by a generator (to store used oil) in good condition with no visible leaks? Yes X No____ N/A____	739.122(b)
739.122(c)	Are containers, aboveground tanks, and fill pipes used for underground tanks labelled or marked "Used Oil"? Yes____ No X N/A____	739.122(c)
739.122(d)	Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes X No____ N/A____	739.122(d)
	Section 739.123: On-Site Burning in Space Heaters	
739.123(a)	Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? Yes____ No X N/A____	739.123(a)
	Section 739.124: Off-Site Shipments	
739.124	Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? Yes X No____ N/A____	739.124

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Subpart D: Standards for Used Oil Collection Centers	
	Section 739.130: Do-It-Yourselfer (DIY) Used Oil Collection Centers	
739.130(b)	Does the DIY collection center comply with the generator standards in Subpart C of Part 739? Yes____ No____ N/A____	739.130(b)
	Section 739.131: Used Oil Collection Centers	
739.131(b)	Is the used oil collection center in compliance with the generator standards in Subpart C of Part 739 and registered by the Agency to manage used oil? Yes____ No____ N/A____	739.131(b)
	Section 739.132: Used Oil Aggregation Points Owned by the Generator	
739.132(b)	Does the owner/operator of a used oil aggregation point comply with all standards in Subpart C of Part 739? Yes____ No____ N/A____	739.132(b)
	Subpart E: Standards for Used Oil Transporter and Transfer Facilities	
	Section 739.141: Restrictions on transporters who are not also processors	
739.141(a)	Has the used oil transporter who processes used oil complied with the requirements for processors in Subpart F [except as provided in subsection 739.141(b)]? Yes____ No____ N/A____	739.141(a)
	Note: Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation.	
739.141(b)	Has the transporter who conducts incidental processing operations that occur in the normal course of transportation (e.g. settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products, complied with the processor requirements in Subpart F? Yes____ No____ N/A____	739.141(b)
	Section 739.142: Notification	
739.142(a)	Has the used oil transporter complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes____ No____ N/A____	739.142(a)
	Section 739.143: Used Oil Transportation	
739.143(a)	Has the used oil transporter delivered all used oil to: 1) another used oil transporter that has a USEPA ID # and an IEPA special waste ID #; or 2) a used oil processing facility that has a USEPA ID # and an IEPA special waste ID #; or 3) an off-spec used oil burning facillity that has a USEPA ID # and an IEPA special waste ID #; or 4) an on-spec used oil burning facility? Yes____ No____ N/A____	739.143(a)
739.143(b)	Has the used oil transporter complied with all applicable packaging and labelling, as well as applicable hazardous material regulations of the USDOT regulations of 49 CFR Parts 171 through 180? Yes____ No____ N/A____	739.143(b)
739.143(c)	Has the used oil transporter who has a discharge of used oil taken appropriate actions as outlined in Part 739? Yes____ No____ N/A____	739.143(c)
	Section 739.144: Rebuttable Presumption	
739.144(a)	Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes____ No____ N/A____	739.144(a)
739.144(d)	Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? Yes____ No____ N/A____	739.144(d)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Section 739.145: Used Oil Storage at Transfer Stations	
739.145	Has the owner/operator of a used oil transfer facility:	
	b) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes____ No____ N/A____	739.145
	c) only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? Yes____ No____ N/A____	
	d) provided for secondary containment for containers as required by this Subsection? Yes____ No____ N/A____	
	e) provided for secondary containment for existing aboveground tanks as required by this Subsection? Yes____ No____ N/A____	
	f) provided for secondary containment for new aboveground tanks as required by this Subsection? Yes____ No____ N/A____	
	g) labelled all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes____ No____ N/A____	
	h) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other material; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes____ No____ N/A____	
	Section 739.146: Tracking	
739.146(a)	Has the used oil transporter kept a record of each used oil shipment that includes: 1) the name and address of the generator, transporter, or processor (GTP) who provided the used oil for transport; and 2) the USEPA ID # and IEPA special waste ID # of the GTP that provided the used oil; and 3) the quantity of used oil accepted; and 4) the date accepted; and 5) the signature of a representative of the GTP that provided the used oil? Yes____ No____ N/A____	739.146(a)
739.146(b)	Has the used oil transporter kept a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor, or disposal facility that includes: 1) the name and address of the receiving facility or transporter: and 2) the USEPA ID # and IEPA special waste ID # of the receiving facility or transporter; and 3) the quantity of used oil delivered; and 4) the date of delivery; and 5) the signature of a representative of the receiving facility or transporter? Yes____ No____ N/A____	739.146(b)
739.146(c)	Has the used oil transporter who exports used oil to a foreign country complied with this subsection? Yes____ No____ N/A____	739.146(c)
739.146(d)	Has the used oil transporter retained all records required under this Section for at least 3 years? Yes____ No____ N/A____	739.146(d)
	Section 739.147: Management of Residues	
739.147	Does the used oil transporter who generates residues from the storage or transportation of used oil manage the residues as specified in Section 739.110? Yes____ No____ N/A____	739.147

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Subpart F: Standards for Used Oil Processors	
	Section 739.151: Notification	
739.151	Has the used oil processor obtained a USEPA ID# and an IEPA special waste ID#? Yes____ No____ N/A____	739.151
	Section 739.152: General Facility Standards	
739.152(a)	Has the owner/operator of a used oil processor and refiner: 1) maintained and operated the facility to minimize the possibility of fire, explosion, or release of used oil; and 2) ensured that he is equipped with the equipment required in this Subsection; and 3) tested and maintained equipment as required; and 4) maintained access to communication or alarm system(s); and 5) maintained the required aisle space; and 6) maintained arrangements with local authorities? Yes____ No____ N/A____	739.152(a)
739.152(b)	Has the owner/operator of a used oil processing and refining facility complied with the following requirements: 1) developed a contingency plan; and 2) ensured that the contingency plan complies with the requirements of this Section; and 3) maintained and submitted to all local authorities copies of the contingency plan and all revisions; and 4) amended the contingency plan as applicable to this Subsection; and 5) ensured that an emergency coordinator is on the premises or on call at all times to meet the requirements of this Subsection; and 6) ensured that emergency procedures meet the requirements of this Subsection? Yes____ No____ N/A____	739.152(b)
	Section 739.153: Rebuttable Presumption	
739.153	Has the used oil processor determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes____ No____ N/A____	739.153
	Section 739.154: Used Oil Management	
	Has the owner/operator of a used oil processor:	
739.154(a)	a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes____ No____ N/A____	739.154(a)
739.154(b)	b) stored used oil at a transfer facility only in containers and aboveground tanks that are in good condition with no visible leaks? Yes____ No____ N/A____	739.154(b)
739.154(c)	c) provided secondary containment for containers as required by this Subsection? Yes____ No____ N/A____	739.154(c)
739.154(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes____ No____ N/A____	739.154(d)
739.154(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes____ No____ N/A____	739.154(e)
739.154(f)	f) labelled or marked containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes____ No____ N/A____	739.154(f)
739.154(g)	g) done the following upon detection of a release of used oil: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes____ No____ N/A____	739.154(g)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.154(h)	h) closed aboveground tanks and containers in accordance with this Section? Yes____ No____ N/A____	739.154(h)
	Section 739.155: Analysis Plan	
739.155	Has the owner/operator of a used oil processing and re-refining facility developed, kept on-site, and followed a written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? Yes____ No____ N/A____	739.155
	Section 739.156: Tracking	
739.156	Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and 2) the name and address of the generator or processor from whom the used oil was sent for processing; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes____ No____ N/A____	739.156
739.156(b)	Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes____ No____ N/A____	739.156(b)
739.156(c)	Have the records described in this Section been maintained for at least 3 years? Yes____ No____ N/A____	739.156(c)
	Section 739.157: Operating Record and Reporting	
739.157(a)	Has the owner/operator kept a written operating record at the facility that contains the following: – records and results of oil analyses performed as described in the analysis plan required under Section 739.155? Yes____ No____ N/A____ – summary reports and details of all incidents that require implementation of the contingency plan as specified in Section 739.152(b)? Yes____ No____ N/A____	739.157(a)
739.157(b)	Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: 1) the IEPA special waste ID #, name and address of the processor: and 2) the calendar year covered by the report; and 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and 4) the USEPA ID #? Yes____ No____ N/A____	739.157(b)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Section 739.158: Off–Site Shipments of Used Oil	
739.158	Has the used oil processor who initiates a shipment of used oil off–site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #?	739.158
	Yes____ No____ N/A____	
	Section 739.159: Management of Residue	
739.159	Does the used oil processor who generates residues from the storage, processing, or re–refining of used oil manage the residues as specified in Section 739.110(e)?	739.159
	Yes____ No____ N/A____	
	Subpart G: Standards for Used Oil Burners Who Burn Off–Spec Used Oil for Energy Recovery	
739.161	**Section 739.161: Restriction on Burning**	
	Is off–spec oil fuel burned for energy recovery only in industrial furnaces identified in Section 720.111, utility boilers, used oil fired space heaters that meet the provisions of Section 739.123, or hazardous waste incinerators?	739.161
	Yes____ No____ N/A____	
	Section 739.162: Notification	
739.162	Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #?	739.162
	Yes____ No____ N/A____	
	Section 739.163: Rebuttable Presumption for Used Oil	
739.163(a)	Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm?	739.163(a)
	Yes____ No____ N/A____	
7 163(d)	Has the used oil burner retained all records of analyses and information used to comply with this Section for at least 3 years?	739.163(d)
	Yes____ No____ N/A____	
	Section 739.164: Used Oil Storage	
	Has the owner/operator of a used oil burning facility:	
739.164(a)	a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725?	
	Yes____ No____ N/A____	739.164(a)
739.164(b)	b) used only containers and aboveground tanks that are in good condition, with no visible leaks, to store used oil?	739.164(b)
	Yes____ No____ N/A____	
739.164(c)	c) provided secondary containment for containers as required by this Subsection?	
	Yes____ No____ N/A____	739.164(c)
739.164(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection?	
	Yes____ No____ N/A____	739.164(d)
739.164(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection?	
	Yes____ No____ N/A____	739.164(e)
739.164(f)	f) labelled or marked all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"?	739.164(f)
	Yes____ No____ N/A____	
739.164(g)	g) upon detection of a release of used oil, done the following:	
	1) stopped the release; and	739.164(g)
	2) contained the release; and	
	3) cleaned up and managed the used oil and other materials; and	
	4) repaired or replaced the containers or tanks prior to returning them to service, if necessary?	
	Yes____ No____ N/A____	

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	Section 739.165: Tracking	
739.165(a)	Has the used oil burner kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the generator or processor from whom the used oil was sent to the burner; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent to the burner; and 5) the quantity of used oil accepted; and 6) the date of acceptance? Yes____ No____ N/A____	739.165(a)
739.165(b)	Have the records described in this Section been maintained on-site for at least 3 years? Yes____ No____ N/A____	739.165(b)
	Section 739.166: Notice	
739.166(a)	Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: 1) the burner has notified the Agency stating the location and general description of the used oil management activities; and 2) the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes____ No____ N/A____	739.166(a)
739.166(b)	Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? Yes____ No____ N/A____	739.166(b)
	Section 739.167: Management of Residue	
739.167	Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes____ No____ N/A____	739.167
	Subpart H: Standards for Used Oil Fuel Marketers	
	Section 739.171: Prohibitions	
739.171	Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? Yes____ No____ N/A____	739.171
	Section 739.172: On-Spec Used Oil Fuel	
739.172(b)	Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept copies of analyses or other information for at least 3 years? Yes____ No____ N/A____	739.172(b)
	Section 739.173: Notification	
739.173(a)	Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes____ No____ N/A____	739.173(a)
	Section 739.174: Tracking	
739.174(a)	Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and adress of the burner who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID # of the burner; and	739.174(a)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	5) the quantity of used oil shipped; and 6) the date of acceptance? Yes____ No____ N/A____	
739.174(b)	Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following: 1) the name and address of the facility receiving the shipment; and 2) the quantity of used oil fuel delivered; and 3) the date of shipment or delivery; and 4) a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)? Yes____ No____ N/A____	739.174(b)
739.174(c)	Have the records described in this Section been maintained on-site for at least 3 years? Yes____ No____ N/A____	739.174(c)
	Section 739.175: Notices	
739.175(a)	Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that: 1) the burner has notified the Agency stating the location and general description of used oil management activities; and 2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes____ No____ N/A____	739.175(a)
	COMMENTS:	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Part 728: Land Disposal Restrictions	
	Subpart A: General	
	Section 728.103: Dilution Prohibited as a Substitute for Treatment	
728.103(a)	Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment? Yes____ No X N/A____	728.103(a)
	Note: Has any person filed for a petition to allow land disposal of wastes prohibited under Subpart C of Part 728? Yes____ No____ N/A X	
	Section 728.104: Treatment Surface Impoundment Exemption	
728.104	Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets the requirements of this Section? Yes____ No____ N/A X	728.104
	Section 728.107: Waste Analysis and Recordkeeping	
728.107(a)	Has the generator tested the waste [as specified in 728.107(a)] or used knowledge of the waste to determine if the waste is restricted from land disposal? Yes X No____ N/A____	728.107(a)
728.107(a)(1)	If a generator determines that its waste is restricted, has a notice been sent with each shipment that includes the following information:	728.107(a)(1)
	A) USEPA Hazardous Waste Number? Yes X No____ N/A X 3/8/01	
	B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes X No____ N/A____	
	C) manifest number associated with the shipment of waste? Yes X No____ N/A X 3/8/01	
	D) for hazardous debris, the contaminants subject to treatment as provided by Section 728.145(b) and the following statement: "This hazardous debris is subject to the alternative treatment standards of Section 728.145?" Yes____ No____ N/A X	
	E) waste analysis data, where available? Yes____ No____ N/A X	
728.107(a)(2)	Has the generator of a restricted waste that meets the applicable treatment standards submitted, with each shipment, a notice and certification, as specified in this Section, stating that the waste meets applicable treatment standards and can be land disposed without further treatment? Yes____ No____ N/A X	728.107(a)(2)
728.107(a)(3)	Has the generator of a restricted waste that has been exempted under Section 728.106 submitted a notice, as specified in this section, with each shipment to the receiving facility, stating that the waste is not prohibited from land disposal? Yes____ No____ N/A X	728.107(a)(3)
728.107(a)(4)	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes____ No____ N/A X	728.107(a)(4)
	Is the plan on-site? Yes____ No____ N/A X	
	Does the plan include a detailed physical and chemical analysis? Yes____ No____ N/A X	
	Has the plan been filed with the Agency at least 30 days prior to commencement of the treatment activity? Yes____ No____ N/A X	

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes____ No____ N/A X	
728.107(a)(5)	Has the generator who has determined that the waste is restricted based on the generator's knowledge and/or testing of the waste retained all supporting data used to make this determination on-site? Yes X No____ N/A____	728.107(a)(5)
728.107(a)(6)	If a generator determines, subsequent to the time of generation, that the generator is managing a restricted waste which is excluded from the definition of hazardous or solid waste or exempt from RCRA, has a one-time notification stating such generation been placed in the generator's files? Yes____ No____ N/A X	728.107(a)(6)
728.107(a)(7)	Does a generator keep on-site a copy of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to this Section for at least five years from the date of the latest shipment? Yes X No____ N/A____	728.107(a)(7)
728.107(a)(8)	If a generator is managing a lab pack that contains waste identified in Appendix D of Part 728 and wishes to use the alternative treatment standard under Section 728.142, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes____ No____ N/A X	728.107(a)(8)
728.107(a)(9)	If a generator is managing a lab pack that contains organic waste identified in Appendix E of Part 728 and wishes to use the alternative treatment standard, has the generator submitted a notice and certification to the treatment facility with each shipment in accordance with this subsection? Yes____ No____ N/A X	728.107(a)(9)
728.107(a 10)	Has a small-quantity generator with a tolling agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes X No____ N/A____	728.107(a)(10)
728.107(b)	Has the treatment facility tested its waste according to the frequency specified in its waste analysis plan as required by Sections 724.113 or 725.113 and subsections (b)(1), (b)(2) and (b)(3) of this section? Yes____ No____ N/A X	728.107(b)
728.107(b)(4)	Has the treatment facility sent a notice to the land disposal facility with each shipment of waste that includes the following information:	728.107(b)(4)
	A) USEPA Hazardous Waste Number? Yes____ No____ N/A X	
	B) corresponding treatment standards or a reference to the treatment standard by section or applicable treatment code? Yes____ No____ N/A X	
	C) manifest number associated with the shipment of waste? Yes____ No____ N/A X	
	D) waste analysis data, where available? Yes____ No____ N/A X	
728.107(b)(5)	Has the treatment facility submitted a certification, as specified in 728.107(b)(5), with each shipment of hazardous waste or treatment residue to the land disposal facility? Yes____ No____ N/A X	728.107(b)(5)
728.107(b)(6)	If the waste or treatment residue will be further managed at a different treatment or storage facility, is the treatment facility sending the waste complying with the notice and certification requirements of Section 728.107(a)? Yes____ No____ N/A X	728.107(b)(6)

728.107(b)(7) Has the recycling facility that is making off-site shipments of recyclable materials used in a manner constituting disposal: — 728.107(b)(7)

- submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(4) and (b)(5)?

Yes_____ No_____ N/A X

- kept records of the name and location of each entity receiving the hazardous waste-derived product?

Yes_____ No_____ N/A X

728.107(c) Has the owner/operator of any land disposal facility disposing of any restricted waste, except where the waste being disposed of is a recyclable material used in a manner constituting disposal: — 728.107(c)

1) maintained copies of the notice and certification specified in subsection 728.107(a) or (b)?

Yes_____ No_____ N/A X

2) tested the waste to ensure that it is in compliance with applicable treatment standards or prohibitions?

Yes_____ No_____ N/A X

728.107(c)(4) **Note:** If the owner/operator is disposing of any waste that is a recyclable material used in a amanner constituting disposal, the owner/operator is not subject to the subsections (c)(1) and (c)(2) with respect to such waste.

728.107(d) Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 728.103(f)(2) provided the following notification and certification: — 728.107(d)

1) a one-time notification submitted to the Agency including the following information:

A) the name and address of the RCRA Subtitle D facility receiving the treated debris?

Yes_____ No_____ N/A X

B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste number(s)?

Yes_____ No_____ N/A X

C) for debris excluded under Section 728.103(f)(2), the technology from Section 728, Table F?

Yes_____ No_____ N/A X

2) Has the notification been updated if the debris is shipped to a different facility or if a different technology is used to treat the debris?

Yes_____ No_____ N/A X

3) For debris excluded under Section 728.103(f)(2), hac the owner/operator of the treatment facility documented and certified compliance with the treatment standards of Section 728, Table F pursuant to this Subsection?

Yes_____ No_____ N/A X

Section 728.109: Special Rules for Characteristic Wastes

728.109(a) Has the generator determined each USEPA hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D? — 728.109(a)

Yes X No_____ N/A_____

Note: For purposes of this Part, the waste will carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).

728.109(b) Does the waste meet the treatment standards for all applicable listed and characteristic waste codes? — 728.109(b)

Yes_____ No X N/A_____

Note: Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic.

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
728.109(c)	Has the generator land disposed any prohibited waste which exhibits a characteristic under Part 721, Subpart C only if the waste complies with the treatment standards under Part 728, Subpart D (in addition to any applicable standards determined from the initial point of generation)? Yes____ No X N/A____	728.109(c)
728.109(d)	1) Has the generator sent the required notification and certification to the appropriate Agency for each shipment of waste to a Subtitle D landfill that no longer exhibits the characteristic? Yes____ No____ N/A X Does the notification include the following information: A) name and address of the non-hazardous waste facility receiving the shipment? Yes____ No____ N/A X B) description of the waste as initially generated, including USEPA hazardous waste number(s), applicable wastewater or nonwastewater category and the subdivisions made within a waste code based on waste specific criteria (such as D003, reactive cyanides)? Yes____ No____ N/A X C) treatment standards applicable to the waste at the initial point of generation? Yes____ No____ N/A X 2) Has the certification been signed by an authorized representative and is the language stated as required in Section 728.107(b)(5)(A)? Yes____ No____ N/A X	728.109(d)
	Subpart C: Prohibition on Land Disposal	
	Section 728.130: Waste Specific Prohibitions -- Solvent Wastes	
728.130	Has the generator of a spent solvent waste (F001-F005) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A X 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A X 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A X	728.130
	Section 728.131: Waste Specific Prohibitions -- Dioxin-Containing Wastes	
728.131	Has the generator of a dioxin-containing waste (~~F020, F021, F022~~, F023, F026, F027 or F028) land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A X 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A X 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A X	728.131
	Section 728.132: Waste Specific Prohibitions -- California List Wastes PCBs <50 ppm	
728.132	Has the generator of a California List Waste land disposed the waste only after having: 1) been granted an adjusted standard from a prohibition pursuant to a petition under Section 728.106 (except for liquid hazardous waste containing PCBs at concentrations greater than or equal to 500 ppm which are not elegible for exemptions; or Yes____ No____ N/A X 2) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A X 3) met the applicable treatment standards specified in Subpart D or, where treatment standards are not specified, the wastes are in compliance with the applicable prohibitions set forth in this Section or Section 728.139? Yes____ No____ N/A X	728.132

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Section 728.133: Waste Specific Prohibitions -- First Third Wastes	
728.133	Has the generator of a first third waste land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A X 2) been granted an adjusted standard pursuant to Section 728.106; or Yes____ No____ N/A X 3) been granted an extension to the effective date of prohibition pursuant to Section 728.105? Yes____ No____ N/A X	728.133
728.133(g)	Has the generator of a first third waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes____ No____ N/A X	728.133(g)
	Section 728.134: Waste Specific Prohibitions -- Second Third Wastes	
728.134	Has the generator of a second third waste land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A X 2) been granted an extension to the effective date of prohibition pursuant to Section 728.105; or Yes____ No____ N/A X 3) been granted an exemption pursuant to Section 728.106? Yes____ No____ N/A X	728.134
728.134(i)	Has the generator of a second third hazardous waste tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of 728.141 or 728.143? Yes X No____ N/A____ UNWASTE WASTE	728.134(i)
	Section 728.135: Waste Specific Prohibitions -- Third Third Wastes	
728.135	Has the generator of a third third waste land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or Yes____ No____ N/A X 2) been granted an exemption from a prohibition pursuant to a petition under Section 728.106; or Yes____ No____ N/A X 3) met the applicable alternate standards established pursuant to a petition granted under Section 728.144; or Yes____ No____ N/A X 4) been granted an extension to the effective date of a prohibition pursuant to Section 728.105? Yes____ No____ N/A X	728.135
728.135(j)	Has the generator of a third third waste listed in 728.110, 728.111 or 728.112 tested the waste or used his knowledge of the waste to determine whether it exceeds the applicable treatment standards of Sections 728.141 or 728.143? Yes____ No____ N/A X	728.135(j)
	Section 728.139: Statutory Prohibitions	
728.139	Has a person caused, threatened or allowed the land disposal of any waste in violation of Section 3004 of RCRA? Yes____ No X N/A____	728.139
	Subpart E: Prohibitions on Storage	
	Note: Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C is prohibited.	
	Section 728.150: Prohibitions on Storage of Restricted Wastes	
728.150(a)(1)	Has the generator stored restricted wastes in tanks or containers on-site solely for the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal? Yes____ No____ N/A X Has the generator complied with the requirements of Section 722.134? Yes____ No____ N/A X	728.150(a)(1)

Regulation	RCRA LDR INSPECTION CHECKLIST (PART 728)	Violation
	Note: A generator in existence on the effective date of regulation under this Part and who must store hazardous wastes for more than 90 days due to regulations under this Part becomes a TSD and must obtain a RCRA permit.	
728.150(a)(2)	Has the owner/operator of a TSD stored restricted wastes in tanks or containers solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes_____ No_____ N/A_X_	728.150(a)(2)
	If yes, has the owner/operator: A) clearly marked each container to identify its contents and the accumulation start date? Yes_____ No_____ N/A_X_ B) clearly marked each tank to identify its contents, recorded the quantity of each hazardous waste received and indicated the accumulation start date, all in accordance with the operating record requirements of 724.173 or 725.173? Yes_____ No_____ N/A_X_	
728.150(a)(3)	Has the transporter stored manifested shipments of such wastes at a transfer facility for 10 days or less? Yes_____ No_____ N/A_X_	728.150(a)(3)
728.150(b)	Has the owner/operator of a TSD stored restricted wastes up to one year solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal? Yes_____ No_____ N/A_X_	728.150(b)
728.150(c)	Has the owner/operator of a TSD who has stored such wastes beyond one year proved that such storage was solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes_____ No_____ N/A_X_	728.150(c)
	Note: If a generator's waste is exempt from a prohibition on the type of land disposal utilized for the waste (e.g. case-by-case extension, incorporated by reference or an approved petition) the prohibition in subsection (a) does not apply during the period of such exemption.	
	Note: The prohibition in subsection (a) does not apply to hazardous wastes that meet the treatment standards (728.141, 728.142 and 728.143) or the adjusted treatment standards (728.144) or where the treatment standards have not been specified, is in compliance with the applicable prohibitions in 728.132 or 728.139.	
728.150(f)	Have liquid hazardous wastes containing PCBs at concentrations greater than 50 ppm been stored at a facility that meets the requirements of 40 CFR 261.65(b) and have they been removed from storage and treated or disposed as required by this Part within one year of the date when such wastes were first placed into storage? Yes_____ No_____ N/A_X_	728.150(f)
	Note: The provisions of subsection (c) do not apply to such PCB wastes prohibited under Section 728.132.	
	COMMENTS:	

EVERLights
LAMP AND BALLAST RECYCLING

Certificate of Recycling

Certificate # 204189

Generator: Williams Ethanol Services, INC
Address: P.O. Box 10
Pekin, IL 61555-0010
Contact: Joe Heredia
Date: January 18, 2001

PCB & MERCURY EVERLights RECYCLING

ITEMS RECEIVED & RECYCLED

75	.....	LB Crushed Fluorescent Lamps
130	.....	Misc. Batteries
14	.....	LB PCB-Ballast

Everlights certifies that the above waste has been successfully recycled and disposed of in accordance with all federal and state regulations.

Sally M. Clara
Environmental Coordinator

EVERLights
LAMP AND BALLAST RECYCLING

Certificate of Recycling

Certificate # 203088

Generator: Williams Ethanol Services, Inc.
Address: PO Box 10
Pekin, IL 61555-0010
Contact: Joe Heredia
Date: December 10, 1999

Items Received and Recycled

Quantity	*Description*
510	4' or less-Fluorescent Lamps
165	8' Fluorescent Lamps

Everlights certifies that the above waste has been successfully recycled and disposed of in accordance with all federal and state regulations.

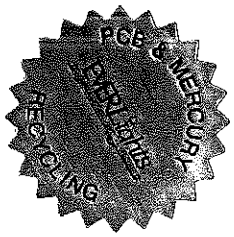
Kelly M. Lan
Environmental Coordinator

EVERLights
LAMP AND BALLAST RECYCLING

Certificate of Recycling

Certificate # 204170

Generator: Williams Ethanol Services
Address: 1300 South 2nd Street
Pekin, IL
Contact: Joe Heredia
Date: January 18, 2001



ITEMS RECEIVED & RECYCLED

680	.....	4' & Under Fluorescent Lamps
150	.....	Above 4' Fluorescent Lamps
75	.....	LB Crushed Fluorescent Lamps
100	.....	Misc. Batteries
200	.....	LB PCB-Ballast

Everlights certifies that the above waste has been successfully recycled and disposed of in accordance with all federal and state regulations.

Environmental Coordinator

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL
P.O. BOX 19276 SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761
FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE

State Form LPC 62 8/81 IL532-0610
PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (Rev. 6-89) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD005075908 Manifest Document No. 184180
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address / Location If Different
WILLIAMS BIO-ENERGY
1300 S. 2ND STREEET
PEKIN, IL 61555

A. Illinois Manifest Document Number IL 8584180 FEE PAID IF APPLICABLE

4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* 309 347-9245

B. Generator's IL ID Number 1790605002

5. Transporter 1 Company Name: HERITAGE TRANSPORT LLC - HR/E
6. US EPA ID Number: IND058484114

C. Transporter's ID Number PW3144600H

7. Transporter 2 Company Name
8. US EPA ID Number

D. Transporter's Phone (317) 381-6848
E. Transporter's ID Number
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
HERITAGE ENVIRONMENTAL SERVICES LLC
15330 CANAL BANK ROAD
LEMONT, IL 60439
10. US EPA ID Number: ILD085349264

G. Facility's IL ID Number 0311620007
H. Facility's Phone (630) 739-1151

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, waste mercury compounds, liquid, nos, 6.1, UN2024 (Hg thermometer) (D009) WBE-9 ERG#151	001	TF	00010	P	EPA HW Number D009 000247
b. mercury compounds, solid, nos, 6.1, UN2025, PG-II (mercuric chloride) WBE-6 ERG# 154	001	DF	00002	P	EPA HW Number CLASS A 000267
RQ, waste flammable liquids, nos, 3, UN1993 PG-II, (toluene, acetone) (F005) WBE-10 ERG#128	001	DF	00010	L	EPA HW Number F005 000247
d. waste, corrosive liquids, nos, 8, UN1760, PG-II (acetic acid / phosphoric acid) ERG#154	001	DF	00001	L	EPA HW Number D002 000247

Additional Description for Materials Listed Above 59368
a. (-1) ; 1 X SPF
b. (-1) ; 1 X SPF
c. (-1) ; 1 X 30 DF ; F003, D001
d. (-1) ; 1 X SPF

K. Handling Codes for Wastes Listed Above In Item #14
JOB # 990610

15. Special Handling Instructions and Additional Information
24 HOUR EMERGENCY PHONE #: 1-800-48-SPILL

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Date Month Day Year
SHARON L. JOSEPH	Sharon L. Joseph	07 25 00

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Brian Meridon	Brian Meridon	072500

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

FACILITY

19. Discrepancy Indication Space

. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Date Month Day Year
Michael Swallo	Michael Swallo	073100

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1 - TSD MAIL TO GENERATOR

In case of a spill call the Illinois Office of Emergency Response at 217/782-7860 and the National Response Center at 800/424-8802 or 202/426-2675.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.: ILD000507908 | Manifest Document No.: 841180 | 22. Page: 2 of 2 | Information in the shaded areas is not required by Federal law.

23. Generator's Name: Williams Bio-Energy, 1300 S. 2nd St, Perkin, IL 61555

L. State Manifest Document Number: IL 8584180

M. State Generator's ID:

24. Transporter Company Name: Heritage Transport, LLC-HRVE | 25. US EPA ID Number: INDOS8484114

N. State Transporter's ID: UPW3194600-04

26. Transporter 3 Company Name | 27. US EPA ID Number

O. Transporter's Phone: 317-381-6040

P. State Transporter's ID

Q. Transporter's Phone

	HM	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	+	corrosive solids, nos, 8, UN1759, PG II (magnesium carbonate, potassium nydroide) WBE-1 ERG#154	001	DF	00010	P	CLASS A 000207
b.	+	Cyanide solutions, nos, 6.1, UN1935) PG II (potassium thiocyanate, ~~acetonitrile~~ methyl cyanide) WBE-2 ERG# 157	001	DF	00001	L	CLASS A 000267
c.	+	amines, flammable, corrosive, nos, 3, UN2733 (Polyolefin amine) PG I WBE-3 ERG #132	001	DF	00001	L	CLASS A 000267
d.	+	Corrosive liquids, nos, 8, UN1760 (Opti-meen DRIC, production-9) PG II WBE-4 ERG#154	001	DF	00001	L	CLASS A 000267
e.	+	Stannic chloride, anhydrous, 8, UN1827, PG I WBE-7 ERG#137	001	DF	00001	L	CLASS A 000267
f.	X	toxic liquid, organic, nos 6.1, UN2810, (dashpot fluid, vapoglass) PG II WBE-8 ERG#153	001	PF	00005	L	CLASS A 000267
g.							
h.							
i.							

S. Additional Descriptions for Materials Listed Above: SG3608

a. (-1); 1x5 DF
b. (-3); 1x5 DF
c. (-2); 1x5 DF
d. (-2); 1x5 DF
e. (-3); 1x5 DF
f. (-2); 1x14 DF

T. Handling Codes for Wastes Listed Above: SOB # 908610

32. Special Handling Instructions and Additional Information

24 Hour emergency phone #: 1-800-48-SPILL

TRANSPORTER

33. Transporter ____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

34. Transporter ____ Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

FACILITY

35. Discrepancy Indication Space

HESLDR3

HERITAGE ENVIRONMENTAL SERVICES, LLC
SUPPLEMENTAL F001-F005 SPENT SOLVENT/D001-D043
UNDERLYING CONSTITUENTS/F039 LEACHATE
LAND DISPOSAL RESTRICTIONS NOTIFICATION

Generator Name: Williams Bio-Energy
EPA I.D. No.: ILD005075908
Manifest Doc. No.: 84180
State Manifest No.: IL8584180

Use this form for F001-F005 spent solvents, characteristic wastes requiring identification of underlying hazardous constituents or for F039 leachate only. For each F001-F005 spent solvent, characteristic waste requiring identification of underlying hazardous constituents, or F039 leachate, check all constituents present. For F001-F005 choose only from constituents in ALL CAPS. For F039 choose from any constituent except those marked with an asterisk. To identify underlying hazardous constituents, choose from any constituent on this form, except fluoride, selenium, sulfide and vanadium, using the treatment standards on the back.

	Regulated Constituent (Check all that apply)	Manifest Page/ Line Item		Regulated Constituent (Check all that apply)	Manifest Page/ Line Item
	Acenaphthylene			Chlordane (alpha and gamma isomers)	
	Acenaphthene			p-Chloroaniline	
X	ACETONE	11c		CHLOROBENZENE	
	Acetonitrile			Chlorobenzilate	
	Acetophenone			2-Chloro-1,3-butadiene	
	2-Acetylaminofluorene			Chlorodibromomethane	
	Acrolein			Chloroethane	
	Acrylamide*			bis(2-Chloroethoxy)methane	
	Acrylonitrile			bis(2-Chloroethyl)ether	
	Aldicarb sulfone*			Chloroform	
	Aldrin			bis(2-Chloroisopropyl)ether	
	4-Aminobiphenyl			p-Chloro-m-cresol	
	Aniline			2-Chloroethyl vinyl ether*	
	Anthracene			Chloromethane (Methyl chloride)	
	Aramite			2-Chloronaphthalene	
	Barban*			2-Chlorophenol	
	Bendiocarb*			3-Chloropropylene	
	Benomyl*			Chrysene	
	alpha-BHC			O-CRESOL	
	beta-BHC			M-CRESOL	
	delta-BHC			P-CRESOL	
	gamma-BHC			m-Cumenyl methlycarbamate*	
	BENZENE			CYCLOHEXANONE	
	Benz(a)anthracene			1,2-Dibromo-3-chloropropane	
	Benzal chloride*			Ethylene dibromide (1,2-Dibromoethane)	
	Benzo(b)fluoranthene			Dibromomethane	
	Benzo(k)fluoranthene			2,4-D (2,4-Dichlorophenoxyacetic acid)	
	Benzo(g,h,i)perylene			o,p'-DDD	
	Benzo(a)pyrene			p,p'-DDD	
	Bromodichloromethane			o,p'-DDE	
	Methyl bromide (Bromomethane)			p,p'-DDE	
	4-Bromophenyl phenyl ether			o,p'-DDT	
	N-BUTYL ALCOHOL			p,p'-DDT	
	Butylate*			Dibenz(a,h)anthracene	
	Butyl benzyl phthalate			Dibenz(a,e,)pyrene	
	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)			m-Dichlorobenzene	
	Carbaryl*			O-DICHLOROBENZENE	
	Carbenzadim*			p-Dichlorobenzene	
	Carbofuran*			Dichlorodifluoromethane	
	Carbofuran phenol*			1,1-Dichloroethane	
	CARBON DISULFIDE			1,2-Dichloroethane	
	CARBON TETRACHLORIDE			1,1-Dichloroethylene	
	Carbosulfan*			trans-1,2-Dichloroethylene	

UNDERLYING HAZARDOUS CONSTITUENT TREATMENT STANDARDS

This table lists the Universal Treatment Standard (UTS) constituents and their wastewater and nonwastewater treatment standards. Use this table to identify the underlying hazardous constituents for D001-D043 wastes treated in non-CWA systems. If a waste contains a constituent on this table at a concentration above the applicable treatment standard, mark the constituent and then indicate the manifest page and line item for that waste on the front of HESLDR3.

Regulated Constituent	Wastewater (mg/l)	Nonwastewater (mg/kg)	Regulated Constituent	Wastewater (mg/l)	Nonwastewater (mg/kg)
Acenaphthylene	0.059	3.4	p-Chloroaniline	0.46	16
Acenaphthene	0.059	3.4	Chlorobenzene	0.057	6.0
Acetone	0.28	160	Chlorobenzilate	0.10	NA
Acetonitrile	5.6	38	2-Chloro-1,3-butadiene	0.057	0.28
Acetophenone	0.010	9.7	Chlorodibromomethane	0.057	15
2-Acetylaminofluorene	0.059	140	Chloroethane	0.27	6.0
Acrolein	0.29	NA	bis(2-Chloroethoxy)methane	0.036	7.2
Acrylamide	19	23	bis(2-Chloroethyl)ether	0.033	6.0
Acrylonitrile	0.24	84	Chloroform	0.046	6.0
Aldicarb sulfone	0.056	0.28	bis(2-Chloroisopropyl)ether	0.055	7.2
Aldrin	0.021	0.066	p-Chloro-m-cresol	0.018	14
4-Aminobiphenyl	0.13	NA	2-Chloroethyl vinyl ether	0.062	NA
Aniline	0.81	14	Chloromethane (Methyl chloride)	0.19	30
Anthracene	0.059	3.4	2-Chloronaphthalene	0.055	5.6
Aramite	0.36	NA	2-Chlorophenol	0.044	5.7
Barban	0.056	1.4	3-Chloropropylene	0.036	30
Bendiocarb	0.056	1.4	Chrysene	0.059	3.4
Benomyl	0.056	1.4	o-Cresol	0.11	5.6
alpha-BHC	0.00014	0.066	m-Cresol	0.77	5.6
beta-BHC	0.00014	0.066	p-Cresol	0.77	5.6
delta-BHC	0.023	0.066	m-Cumenyl methlycarbamate	0.056	1.4
gamma-BHC	0.0017	0.066	Cyclohexanone	0.36	0.75 mg/l TCLP
Benzene	0.14	10	1,2-Dibromo-3-chloropropane	0.11	15
Benz(a)anthracene	0.059	3.4	Ethylene dibromide (1,2-Dibromoethane)	0.028	15
Benzal chloride	0.055	6.0	Dibromomethane	0.11	15
Benzo(b)fluoranthene	0.11	6.8	2,4-D (2,4-Dichlorophenoxyacetic acid)	0.72	10
Benzo(k)fluoranthene	0.11	6.8	o,p'-DDD	0.023	0.087
Benzo(g,h,i)perylene	0.0055	1.8	p,p'-DDD	0.023	0.087
Benzo(a)pyrene	0.061	3.4	o,p'-DDE	0.031	0.087
Bromodichloromethane	0.35	15	p,p'-DDE	0.031	0.087
Methyl bromide (Bromomethane)	0.11	15	o,p'-DDT	0.0039	0.087
4-Bromophenyl phenyl ether	0.055	15	p,p'-DDT	0.0039	0.087
n-Butyl alcohol	5.6	2.6	Dibenz(a,h)anthracene	0.055	8.2
Butylate	0.042	1.4	Dibenz(a,e,)pyrene	0.061	NA
Butyl benzyl phthalate	0.017	28	m-Dichlorobenzene	0.036	6.0
2-sec-Butyl-4,6-dinitrophenol (Dinoseb)	0.066	2.5	o-Dichlorobenzene	0.088	6.0
Carbaryl	0.006	0.14	p-Dichlorobenzene	0.090	6.0
Carbenzadim	0.056	1.4	Dichlorodifluoromethane	0.23	7.2
Carbofuran	0.006	0.14	1,1-Dichloroethane	0.059	6.0
Carbofuran phenol	0.056	1.4	1,2-Dichloroethane	0.21	6.0
Carbon disulfide	3.8	4.8 mg/l TCLP	1,1-Dichloroethylene	0.025	6.0
Carbon tetrachloride	0.057	6.0	trans-1,2-Dichloroethylene	0.054	30
Carbosulfan	0.028	1.4	2,4-Dichlorophenol	0.044	14
Chlordane (alpha and gamma isomers)	0.0033	0.26	2,6-Dichlorophenol	0.044	14

HERITAGE HESLDR3

HERITAGE ENVIRONMENTAL SERVICES, LLC
SUPPLEMENTAL F001-F005 SPENT SOLVENT/D001-D043 UNDERLYING CONSTITUENTS/F039 LEACHATE LAND DISPOSAL RESTRICTIONS NOTIFICATION

	Regulated Constituent (Check all that apply)	Manifest Page/ Line Item		Regulated Constituent (Check all that apply)	Manifest Page/ Line Item
	Parathion			Toxaphene	
	Total PCBs (sum of all PCB isomers, or all Aroclors)			Triallate*	
	Pebulate*			Tribromomethane (Bromoform)	
	Pentachlorobenzene			2, 4, 6-Tribromophenol	
	PeCDDs (All Pentachlorodibenzo-p-dioxins)			1,2,4-Trichlorobenzene	
	PeCDFs (All Pentachlorodibenzofurans)			1,1,1-TRICHLOROETHANE	
	Pentachloroethane*			1,1,2-TRICHLOROETHANE	
	Pentachloronitrobenzene			TRICHLOROETHYLENE	
	Pentachlorophenol			TRICHLOROMONOFLUOROMETHANE	
	Phenacetin			2,4,5-Trichlorophenol	
	Phenanthrene			2,4,6-Trichlorophenol	
	Phenol			1,2,3-Trichloropropane	
	Phorate			1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	
	Phthalic acid*			Triethylamine*	
	Phthalic anhydride			tris-(2,3-Dibromopropyl) phosphate	
	Physostigmine*			Vernolate*	
	Physostigmine salicylate*			Vinyl chloride	
	Promecarb*		X	XYLENES-MIXED ISOMERS	11C
	Pronamide			Antimony	
	Propham*			Arsenic	
	Propoxur*			Barium	
	Prosulfocarb*			Beryllium	
	Pyrene			Cadmium	
	PYRIDINE			Chromium (Total)	
	Safrole			Cyanides (Total)[1]	
	Silvex (2,4,5-TP)			Cyanides (Amenable)[1]	
	2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)			Fluoride[2]	
	1,2,4,5-Tetrachlorobenzene			Lead	
	TCDDs (All Tetrachlorodibenzo-p-dioxins)			Mercury - Nonwastewater from Retort	
	TCDFs (All Tetrachlorodibenzofurans)			Mercury - All Others	
	1,1,1,2-Tetrachloroethane			Nickel	
	1,1,2,2-Tetrachloroethane			Selenium[2]	
	TETRACHLOROETHYLENE			Silver	
	2,3,4,6-Tetrachlorophenol			Sulfide[2]	
	Thiodicarb*			Thallium	
	Thiophanate-methyl*			Vanadium[2]	
X	TOLUENE	11C			

* Not an F039 constituent

(1) Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-486 Method 9010 or 9012 with a sample size of 10 grams and a distillation time of one hour and 15 minutes.

(2) Fluoride, selenium, sulfide, and vanadium are F039 constituents only and are not underlying hazardous constituents for characteristic wastes.

Regulated Constituent	Wastewater (mg/l)	Nonwastewater (mg/kg)	Regulated Constituent	Wastewater (mg/l)	Nonwastewater (mg/kg)
Pentachloronitrobenzene	0.055	4.8	2,4,6-Tribromophenol	0.035	7.4
Pentachlorophenol	0.089	7.4	1,2,4-Trichlorobenzene	0.055	19
Phenacetin	0.081	16	1,1,1-Trichloroethane	0.054	6.0
Phenanthrene	0.059	5.6	1,1,2-Trichloroethane	0.054	6.0
Phenol	0.039	6.2	Trichloroethylene	0.054	6.0
Phorate	0.021	4.6	Trichloromonofluoromethane	0.020	30
Phthalic acid	0.055	28	2,4,5-Trichlorophenol	0.18	7.4
Phthalic anhydride	0.055	28	2,4,6-Trichlorophenol	0.035	7.4
Physostigmine	0.056	1.4	1,2,3-Trichloropropane	0.85	30
Physostigmine salicylate	0.056	1.4	1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	30
Promecarb	0.056	1.4	Triethylamine	0.081	1.5
Pronamide	0.093	1.5	tris-(2,3-Dibromopropyl) phosphate	0.11	0.10
Propham	0.056	1.4	Vernolate	0.042	1.4
Propoxur	0.056	1.4	Vinyl chloride	0.27	6.0
Prosulfocarb	0.042	1.4	Xylenes-mixed isomers	0.32	30
Pyrene	0.067	8.2	Antimony	1.9	1.15 mg/l TCLP
Pyridine	0.014	16	Arsenic	1.4	5.0 mg/l TCLP
Safrole	0.081	22	Barium	1.2	21 mg/l TCLP
Silvex (2,4,5-TP)	0.72	7.9	Beryllium	0.82	1.22 mg/l TCLP
2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)	0.72	7.9	Cadmium	0.69	0.11 mg/l TCLP
1,2,4,5-Tetrachlorobenzene	0.055	14	Chromium (Total)	2.77	0.60 mg/l TCLP
TCDDs (All Tetrachlorodibenzo-p-dioxins)	0.000063	0.001	Cyanides (Total)[1]	1.2	590
TCDFs (All Tetrachlorodibenzofurans)	0.000063	0.001	Cyanides (Amenable)[1]	0.86	30
1,1,1,2-Tetrachloroethane	0.057	6.0	Lead	0.69	0.75 mg/l TCLP
1,1,2,2-Tetrachloroethane	0.057	6.0	Mercury - Nonwastewater from Retort	NA	0.20 mg/l TCLP
Tetrachloroethylene	0.056	6.0	Mercury - All Others	0.15	0.025 mg/l TC
2,3,4,6-Tetrachlorophenol	0.030	7.4	Nickel	3.98	11 mg/l TCLP
Thiodicarb	0.019	1.4	Silver	0.43	0.14 mg/l TCLP
Thiophanate-methyl	0.056	1.4	Thallium	1.4	0.20 mg/l TCLP
TOLUENE	0.080	10			
Toxaphene	0.0095	2.6			
Triallate	0.042	1.4			
Tribromomethane (Bromoform)	0.63	15			

(1) Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-846 Method 9010 or 9012 with a sample size of 10 grams and a distillation time of one hour and 15 minutes.

NOTE: NA means not applicable.

HERITAGE

HESLDR1

LAND DISPOSAL RESTRICTIONS (LDR) NOTICE AND CERTIFICATION

Generator Name: Williams Bio-Energy EPA I.D. No.: ILD005075908

Manifest Doc. No.: 84180 State Manifest No.: IL 6582180

(1) Manifest Page/Line Item	(2) Hazardous Waste Code[A] (One per line)	(3) Waste Water[B]	(4) Non-Waste Water[B]	(5) Subcategory (if applicable)[C]	(6) Underlying Constituents?[D] (Circle one)	(7) Applicable Certification[E] (One per line)
11a	D009		X		Yes / No / NA	1
11c	F005		X	N/A	Yes / No / NA	1
11c	F003		X	N/A	Yes / No / NA	1
11c	D002		X	1.2	Yes / No / (NA)	1
11d	D002		X	5	Yes / (No) / NA	1
					Yes / No / NA	
					Yes / No / NA	

A To list additional waste codes complete a Heritage LDR Continuation Form (HESLDR2). Complete a Heritage Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (HESLDR3) if one or more applicable waste codes are F001, F002, F003, F004, F005, or F039.

B Must check one, either wastewater or non-wastewater.

C Enter "NA" if no subcategory is applicable to the waste code (see back of HESLDR1 or 40 CFR 268.40).

D If "Yes" is circled, complete Heritage Supplemental F001-F005 Spent Solvent/Underlying Constituents/F039 Leachate Form (HESLDR3). For F001-F005 or F039 wastes, circle "NA" and identify F001-F005 or F039 constituents on HESLDR3.

E Choose from list of certifications below and enter number. Enter only one number per line. Enter date waste is subject to prohibition if Certification #3 applies.

(1) Waste Does Not Meet Applicable Treatment Standards - This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268.

(2) Waste Meets Applicable Treatment Standards - I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

(3) Waste Subject to Exemption - This waste is subject to an exemption from a prohibition, such as a case-by-case extension, an exemption, or a nationwide capacity variance. (Include date subject to LDR in Column 7)

(4) Waste Treated to Applicable Treatment Standards (choose one):

(4a) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(4b) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(5) Characteristic Waste Treated to Remove Characteristic (choose one):

(5a) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(5b) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in 268.2(i), have been treated on-site to meet the 268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

(6) Lab Pack Managed According to Alternative Treatment Standard at 40 CFR 268.42(c) (INCIN) - I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under Appendix IV to Part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

I certify that the information provided on this and any additional pages (HESLDR2; HESLDR3) of this LDR notification is true, accurate and complete.

Authorized Signature: Sharon L Joseph Print or Type Name: SHARON L. JOSEPH

Co any/Title: WILLIAMS BIOENERGY - LAB ANALYST

Da 9/25/00

Heritage does not warrant the acceptability of this form for any specific purpose, waste or treatment method and does not warrant that its use will constitute compliance with applicable law and expressly disclaims responsibility or liability, for any penalties, damages or other costs which may arise out of or be related to use of this document.

USEPA HAZARDOUS WASTE CODES WITH SUBCATEGORIES

Refer to this table to determine the appropriate subcategory for Column 5 of HESLDR1 or HESLDR2 and to determine whether it is necessary to complete HESLDR3. If the waste code you entered in Column 2 of HESLDR1 or HESLDR2 is not in this table enter "NA" in Columns 5 and 6.

Waste Code (1)		Underlying Constituents Required?	Subcategory (2)
D001	1.1	Y	Ignitable characteristic wastes managed in non-CWA systems (except for the 40 CFR 261.21(a)(1) High TOC Subcategory)
	1.2	N	Ignitable characteristic wastes managed by incineration, fuels substitution, or organics recovery (except for the 40 CFR 261.21(a)(1) High TOC Subcategory)
	2	N	Ignitable characteristic wastes managed in CWA Systems (except for the 40 CFR 261.21(a)(1) High TOC Subcategory)
	3	N	High TOC Ignitable Characteristic Liquids Subcategory (based on 40 CFR 261.21(a)(1) greater than or equal to 10% total organic carbon) (Note: This subcategory consists of nonwastewaters only)
D002	4	Y	Corrosive characteristic wastes managed in non-CWA systems
	5	N	Corrosive characteristic wastes managed in CWA systems
D003	6	N	Reactive Sulfides Subcategory (based on 40 CFR 261.23(a)(5))
	50	N	Unexploded ordnance and other explosive devices from an emergency response
	7	Y	Explosives Subcategory (based on 40 CFR 261.23(a)(6), (7) and (8))
	8	Y	Other Reactives Subcategory (based on 40 CFR 261.23(a)(1))
	9	Y	Water Reactives Subcategory (based on 40 CFR 261.23(a)(2), (3) and (4)) (Note: This subcategory consists of nonwastewaters only)
	10	N	Reactive Cyanides Subcategory (based on 40 CFR 261.23(a)(5))
D006	11	N	Cadmium Containing Batteries Subcategory (Note: This subcategory consists of nonwastewaters only. For D006 wastes that do not fit this subcategory, enter "NA" in Column 5)
D008	12	N	Lead Acid Batteries Subcategory (Note: This subcategory consists of nonwastewaters only. For D008 wastes that do not fit this subcategory, enter "NA" in Column 5)
D009	13	N	High Mercury-Organic Subcategory (Nonwastewaters ≥260 mg/kg total mercury containing organics that are not incinerator residues)
	14	N	High Mercury-Inorganic Subcategory (Nonwastewaters ≥260 mg/kg total mercury that are inorganic, including incinerator residues and residues from RMERC)
	15.1	N	Low Mercury Subcategory (Nonwastewaters <260 mg/kg total mercury that are residues from RMERC only)
	15.2	N	Low Mercury Subcategory (Nonwastewaters <260 mg/kg total mercury that are not residues from RMERC)
	16	N	All D009 wastewaters
D004-D043	48	Y	TC waste managed in non-CWA system
	49	N	TC waste managed in CWA system
F025	17	N	Light Ends Subcategory
	18	N	Spent Filters/Aids and Desiccants Subcategory
K006	19	N	Anhydrous
	20	N	Hydrated
K069	21	N	Calcium Sulfate (Low Lead) Subcategory
	22	N	Non-Calcium Sulfate (High Lead) Subcategory
K071	23	N	Nonwastewaters residues from RMERC
	24	N	Nonwastewaters not residues from RMERC
	25	N	All K071 wastewaters
K106	26	N	Nonwastewaters ≥260 mg/kg total mercury
	27	N	Nonwastewaters <260 mg/kg total mercury residues from RMERC
	28	N	Nonwastewaters <260 mg/kg total mercury not residues from RMERC
	29	N	All K106 wastewaters
P047	30	N	4,6-Dinitro-o-cresol
	31	N	4,6-Dinitro-o-cresol salts
P065	32	N	Nonwastewaters, regardless of total mercury content, not incinerator residues and not residues from RMERC
	33	N	Nonwastewaters either incinerator residues or residues from RMERC; and ≥260 mg/kg total mercury
	34	N	Nonwastewaters residues from RMERC and <260 mg/kg total mercury
	35	N	Nonwastewaters incinerator residues and <260 mg/kg total mercury
	36	N	All P065 wastewaters
P092	37	N	Nonwastewaters, regardless of total mercury content, not incinerator residues and not residues from RMERC
	38	N	Nonwastewaters either incinerator residues or residues from RMERC; and ≥260 mg/kg total mercury
	39	N	Nonwastewaters residues from RMERC and <260 mg/kg total mercury
	40	N	Nonwastewaters incinerator residues and <260 mg/kg total mercury
	41	N	All P092 wastewaters
U151	42	N	Nonwastewaters ≥260 mg/kg total mercury
	43	N	Nonwastewaters <260 mg/kg total mercury and residues from RMERC
	44	N	Nonwastewaters <260 mg/kg total mercury and not residues from RMERC
	45	N	All U151 wastewaters
U240	46	N	2,4-D
	47	N	2,4-D salts and esters

Columbia, South Carolina 29201

CUSTOMER NO. 00-0-2477-14

CUSTOMER / GENERATOR

PEKIN ENERGY CO
1300 S SECOND ST
PO BOX 10
PEKIN IL 61555

FOR SERVICE CALL	BRANCH MANAGER	DOC. EXP.	SCHEDULED SERVICE WEEK	SCHEDULED TERRITORY	REFERENCE NUMBER
309-346-1	BRET HENRY	03/03/01	01-01	04	1005207441

CREDIT CODE	PREVIOUS BALANCE	BAL. OVER 60 DAYS
B	216.70	

BUSINESS TYPE	CHAIN	OUTER COUNTY	SVC. P/C	PROD. P/
06	0167	NO	0273	0001

LOCATION	TAX EXEMPTION NO.
513601	

SERVICE DATE	SALES REP NO.	CUSTOMER P.O. NUMBER	CUSTOMER PHONE #	TAX CODE	HANDLING CODE		ASSOC. CODE	SERVICE TAX	C.O.M.S. TAX	PRODUCT TAX
1/4/2001	0123		309-347-9351	14-550-6210		PW				.0725

DEP.	SERVICE/ PRODUCT	SERIAL NUMBER	REMARKS/ UNIT PRICE	QUAN.	CHARGE	SALES TAX	TOTAL CHARGE	WASTE MIN.	SOLVENT/DRUMS CLEAN	SPENT	# OF CONT.	SK DOT	CC	SERVICE TERM	CHANGE SERVICE TERM (WEEKS) (INITIAL)	CHANGE SCH. DATE (YY WW)	INV. CODE	PROMO NO.	RELEASE NO.	MS GN
1	003230			1										0						
2	0022555			1							3	1476		12						
3	0034150	34000820	GARAGE	1	180.80	0.00	180.80	0.00	36	25	2	717		8		10				
4	0044150	44008982	NOT AFTR 3	1	194.90	0.00	194.90	0.00	34	31	3	975		2		9				
5	0100001	Fuel Charge	2.9000	1	2.90	-	2.90							0						
6																				
7																				
8																				
9																				
0																				
1																				
2																				
	TOTAL-SERVICE/PRODUCTS				~~375.70~~	0.00	~~375.70~~ 328.60	0.00												

CHECK APPROPRIATE BOXES →

	GOOD	POOR
MACHINE CONDITION & CLEANLINESS	✓	
LAMP ASSEMBLY CONDITION	✓	

	YES	NO
DECALS IN PLACE AND LEGIBLE	✓	
FUSIBLE LINK INSTALLED		
EMERGENCY CLOSING OF LID UNOBSTRUCTED		

	YES	NO
MACHINE PROPERLY GROUNDED		
LOCAL PHONE NO. STICKER AFFIXED TO MACHINE		
SPENT SOLVENT MEETS ACCEPTANCE CRITERIA		

USEPA TRANSPORTER 1 ID NO.	USEPA TRANSPORTER 2 ID NO.	GENERATOR USEPA ID NO.	GENERATOR STATE ID NO.
SCR000075150		ILD005075906	1790605002

11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	12. CONTAINERS NO.	TYPE	13. TOTAL QUANTITY	14. UNIT WT/VOL	SK DOT NUMBER
1. WASTE COMBUSTIBLE LIQUID, N.O.S. PETROLEUM NAPHTHA NA1993 PG III D039 ERG#128 6.7LBS/GAL	2	DM	25	G	717
2. WASTE COMBUSTIBLE LIQUID, N.O.S. PETROLEUM NAPHTHA NA1993 PGIII D039,D008,D018,D040 ERG#128 6.7#/GAL	2	DM	31	G	975
3. DRAINED USED OIL FILTERS NOT USDOT OR USEPA REGULATED	0	DM	0	G	1476
4.					
5.					

5 16 30 55

I CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES.

0 TO 220 LBS./MONTH	INITIALS
220 LBS. TO 2,200 LBS./MONTH	TC INITIALS
GREATER THAN 2,200 LBS./MONTH	INITIALS

DESIGNATED FACILITY NAME AND ADDRESS: SAFETY-KLEEN SYSTEMS, INC. PEKIN, IL 61554 RR #3

I CERTIFY THAT NO MATERIAL CHANGE HAS OCCURRED EITHER IN THE CHARACTERISTICS OF THE WASTE MATERIALS OR IN THE PROCESS GENERATING THE WASTE MATERIALS.

USA EPA ID NO. ILD093862811

STATE ID NO. 1790600011

CASH ☐	TOTAL RECEIVED	APPLY PAYMENT TO:
CHECK NUMBER		☐ TODAY'S SERVICE/SALE ☐ PREVIOUS BALANCE AS FOLLOWS

INVOICE #	AMOUNT $	INVOICE #	AMOUNT $

CREDIT CARD NO. | EXP. DATE | AMEX VISA MC

MANIFEST NO.
XXXXX
LDR MESSAGE
LDR REQ D
MANIFEST CODE: PP / SEQ #: 84

IN THE EVENT OF AN EMERGENCY CALL

I AGREE TO PAY THE ABOVE CHARGES AND TO BE BOUND BY THE TERMS AND CONDITIONS SET FORTH ABOVE AND ON THE REVERSE SIDE OF THIS DOCUMENT. PLEASE CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. THE INDIVIDUAL SIGNING THIS DOCUMENT IS DULY AUTHORIZED TO SIGN AND BIND CUSTOMER TO ITS TERMS.

"This is to certify that the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation."

Print Customer Name

By: Tom Loeffler

TOTAL CHARGE (FROM ABOVE)	
WASTE MIN. (FROM ABOVE)	
TOTAL DUE	328.60

DO NOT WRITE IN THE AREA BELOW

0005207441
0000-2477-14 -4

SERVICE AND SALES ACKNOWLEDGMENT

WILLIAMS BIO-ENERGY

SHORT FORM CONTRACT SUMMARY & TALLY SHEET

2000 ANNUAL CONTRACT

CONTRACT NUMBEI 783

ONTRACT DATE : 3/22/00

VENDOR # : 2311 **NEW 9917**

VENDOR NAME : SAFETY KLEEN

VENDOR ADDRESS 14249 VFW ROAD

PEKIN, IL 61554

PHONE NUMBER : (309) 346-1818

TAX STATUS : **TAXABLE**

PURCHASE AGENT MICHAEL J SELK

REQUESTOR : ANTONACCI

ORIGINAL PRICE : $ SEE BELOW

ADD'L FUND # : NONE

ADD'L FUND DATE: NONE

CURRENT PRICE : $ **SEE BELOW**

INSURANCE FORM C2A

PAYMENT TERMS : **NET 30 DAYS**

ACCT NUMBER : 7403.6000

NEW 234 0105 2027 6330 .0

ENDING DATE:

DESCRIPTION : PROVIDE "LEASE SERVICE" FOR WILLIAMS ETHANOL SERVICES, INC. INCLUDING TWO (2) MODEL 34 and ONE (1) MODEL 44 SAFETY KLEEN PARTS WASHER, AND FULL MAINTENANCE OF SAME. SERVICE TO INCLUDE DELIVERY OF CLEANING SOLVENT, AND REMOVAL AND RECYCLING OF DIRTY SOLVENT IN ACCOURDANCE WITH ALL LOCAL, STATE AND FEDERAL EPS REGULTIONS. **TWENTY-FOUR MONTH PRICE/ GUARANTEE/ SERVICE CONTRACT.**

SERVICE INTERVAL - 8 WEEKS- #340-00820 & 340-00821 $176.25 (EFFECTIVE 2-4 00 $180.80)

ERVICE INTERVAL - 2 WEEKS - $440-08992 $190.00 (EFFECTIVE 2-4-00 $194.90)

INVOICE DATE		INVOICE NUMBER	INVOICE AMOUNT	TOTAL PAID TO DATE
BALANCE FORWARD FROM PAGE 1				4,850.65
11/21/2000	4762765	14545927	194.90	5,045.55
12/11/2000	4914574	14744742	194.90	5,240.45
12/27/2000	5058830	14887597	194.90	5,435.35
1/12/2001	5207441	15062211	378.60	378.60

513601 LDR NOTIFICATION FORM 10:48:40

R NAME: PEKIN ENERGY CO MANIFEST NO.: XXXXX
OR SALES SERVICE NO.: 5207441

CUST#: 0000-2477-14

IANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
T RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01A SK PROFILE NO.: 0000
SKDOT#: 0000717

WASTE CODES & LDR SUBCATEGORIES (IF ANY):
39

ATABILITY GROUP: NONWASTEWATERS

TE CONSITITUENT NOTIFICATION:
0 O-CRESOL
9 TETRACHLOROETHYLENE
7 TRICHLOROETHYLENE
0 CADMIUM
5 LEAD
7 MERCURY - ALL OTHERS
0 SILVER

FORM LINE NO.: 2 MANIFEST PAGE/LINE# 01B SK PROFILE NO.: 0000
SKDOT#: 0000975

WASTE CODES & LDR SUBCATEGORIES (IF ANY):
39
08
18
40

ATABILITY GROUP: NONWASTEWATERS

TE CONSITITUENT NOTIFICATION:
9 TETRACHLOROETHYLENE
7 TRICHLOROETHYLENE
0 CADMIUM
HROMIUM (TOTAL)
5 LEAD
BENZENE
CHLOROBENZENE

N O T E S

NOTICE: THIS LDR EXPIRES ON 12/31/200[illegible].

TOR'S AUTHORIZED SIGNATURE _____ NAME & TITLE (PRINTED OR TYPED) _____ ____ / ____ / ____ DATE

#: 7134 LOC: 513601 TERR: 04 REF#: 5207441 SW: 0101

OP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

TELEPHONE CONVERSATION RECORD

SUBJECT: Williams Ethanol Services **DATE:** 4/5/01 **TIME:** 1:45 PM

PERSON IN CONTACT WITH: Steve Antonacci **ORGANIZATION:** Williams **PHONE #:** (309) 347-9241

TYPE: **TELEPHONE (x)** **CONFERENCE ( )** **VISIT ( )**
INCOMING () **LOCATION:**
OUTGOING (x)

SUMMARY

I spoke with Mr. Antonacci regarding follow-up information to my inspection at Williams on February 22, 2001. I had a few questions for him. I asked him if there was a telephone or communication device at the outside used oil area. I pointed out that during the inspection there was a drum of hazardous waste there. He stated that there was no telephone there, but after looking at the drum marked as hazardous waste, it turned out that the contents of the drum were not hazardous waste. He stated that this drum has been shipped off-site. He also added that the hazardous waste room now has a fire extinguisher and a sign has been posted on what to do if there is an emergency. He stated that a phone has not been put out there, but the operators should be carrying radios. He also said that there is a telephone next door. I asked him about the "Smoothing Liquid" that was in the hazardous waste room. He stated that they are still looking for a use for this material. If they can't find any need for it, then it will be shipped off-site as a waste. I asked him about the company's used oil hauler. He stated that Safety-Kleen is the used oil hauler and that the oil goes to one of Safety-Kleen's oil recycling facilities.

This concluded our conversation.

Howard A. Cain 4/5/01

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FILE
9th fl.

SEP 25 2000

REPLY TO THE ATTENTION OF

D-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gregory F. Rapacz,
Quality Control Manager
Meyer Steel Drum, Inc.
2000 South Kilbourn
Chicago, IL 60623

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILD 038 503 900

Dear Mr. Rapacz:

On August 22, 2000, representatives of the United States Environmental Protection Agency (U.S. EPA) inspected Meyer Steel Drum, Inc.(Meyer), located in Chicago, Illinois. The purpose of the inspection was to evaluate Meyer's compliance with the Standards Applicable to Generators of Hazardous Waste, the Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities, and the Land Disposal Restrictions set forth at 35 Illinois Administrative Code (IAC), Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board. Enclosed please find a copy of our inspection report.

Based on our August 22, 2000, inspection, we have determined that Meyer is violating the following federally authorized state regulations.

~ IAC Part 722: Standards Applicable to Generators of Hazardous Waste:

Section 722.134 (c) - The facility or installation must limit satellite accumulation to 55 gallons (110 kilograms) and mark the containers with the words " Hazardous Waste" or with other words that identify the contents of the containers. When the 55-gallon limit is met, the facility or installation must mark the

container with an accumulation start date and move the container to a hazardous waste storage area within three days of the accumulation start date. Meyer failed to mark a 55-gallon container of spent paint/waste paint in the process area with the words, "Hazardous Waste" or with words that identify the contents of the containers.

Section 722.140 - The facility or installation must keep a copy of each annual report for a period of at least three years from the due date of the report (March 1). Meyer did not have copies of annual reports for the past three years.

Section 722.141 - The facility or installation who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States shall prepare and submit a single copy of an annual report to the Illinois Environmental Protection Agency (IEPA) by March 1 for the preceding calendar year. The annual report must be submitted on a form supplied by the IEPA, and must cover generator activities during the previous calendar year, and must include the information required under Section 722.141(a)(1) through (a)(8). Any generator who treats, stores or disposes of hazardous waste on-site must submit an annual report covering those wastes in accordance with the provisions of 35 IAC 702, 703, 724, 725 and 726. Meyer did not have records that indicated that annual reports were submitted to IEPA.

~ IAC Part 725: Interim Status Standards for Owners and Operators of Treatment, Storage, and Disposal Facilities:

Section 725.132 (b)and(c) - The facility or installation must be equipped with the required equipment, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment. Gregory Rapacz, Quality Control Manager/Plant Manager, stated that a service contractor comes out to Meyer on a monthly basis to repair, replace and inspect all fire extinguishers to make sure that the fire extinguishers are all operational. Meyer did not have a fire extinguisher available at time of inspection.

Section 725.134(a) - Whenever hazardous waste is being poured, mixed, spread or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under Section 725.132. The person handling spent solvents in the lid painting area did not have immediate access

to an internal alarm nor was the lid painting area equipped with any emergency communication device.

Section 725.137 - Arrangements with local emergency authorities must be made to familiarize them with the layout of the facility or installation, the properties of hazardous waste managed, places where personnel are working, entrances and evacuation routes. Meyer did not have records that preparedness and prevention arrangements had been attempted with the local emergency authorities.

Section 725.152 (c), (d) and (e) - The contingency plan must describe arrangements with the police and fire departments, hospitals, contractors and emergency response teams, contain the emergency coordinator's name and home address, and identify and describe the location of all emergency equipment. Meyer's contingency plan did not describe the arrangements with local authorities, contain the emergency coordinator's home address, nor identify the location of all emergency equipment.

Section 725.153 - The contingency plan must be submitted to the police department, fire department, hospital and emergency response teams. Meyer did not have records that the contingency plan had been submitted to the local emergency authorities.

Section 725.116(a) through (e) - The facility or installation must have a personnel training program that covers, at a minimum, 1) the procedures to familiarize personnel with emergency procedures, emergency equipment and emergency systems; 2) the procedures for using, inspecting, repairing and replacing emergency and monitoring equipment; 3) communications and alarm system; 4) response to fires and explosions; 5) response to groundwater contamination incidents; and 6) shutdown of operations. The facility or installation must also train all new employees within six months of the date of employment, and conduct an annual review of the initial training. Documents and records must be kept by the facility or installation including job titles, job descriptions, description of hazardous waste training, and records that document the training given to facility or installation personnel. The facility or installation must keep these training records until closure of the facility or installation or for at least three years for former employees. Meyer did not have records that demonstrated that the training program was in place, that new employees had been trained within six months of employment, that employees had received an annual review, and that all required records were being maintained.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Sheila Burrus, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, D-9J, Chicago, Illinois 60604.

If you have any questions regarding this matter, feel free to contact Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Cliff Gould, IEPA
Todd Marvel, IEPA

U.S. EPA Region 5
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	Meyer Steel Drum, Inc.
USEPA ID NO.:	ILD 038 503 900
FACILITY ADDRESS:	2000 South Kilbourn Avenue Chicago, IL 60623
FACILITY TYPE:	Large Quantity Generator
FACILITY REPRESENTATIVE:	Gregory F. Rapacz Quality Control Manager/Plant Manager (773) 522-3030
USEPA INSPECTORS:	Duncan Campbell and Sheila Burrus
STATE INSPECTOR:	None
SIC CODE:	3412
REPORT PREPARED BY:	Sheila Burrus

FACILITY BACKGROUND

Meyer Steel Drum, Inc. (Meyer) is a facility that specializes in manufacturing steel drums.

HAZARDOUS WASTE GENERATION

Meyer's operation generates characteristic waste for the toxic constituent of lead D008 and also characteristic for ignitability.

COMPLIANCE EVALUATION INSPECTION

On August 22, 2000, Duncan Campbell and Sheila Burrus of the United States Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch conducted a compliance evaluation inspection of Meyer Steel Drum, Inc. located in Chicago, Illinois. Upon arrival at the site, Mr. Campbell and I introduced ourselves to Gregory F. Rapacz, Quality Control Manager/Plant Manager and presented our enforcement credentials. Mr. Campbell made a brief introduction as to the purpose of the inspection.

The inspection consisted of a record review, followed by a tour of the facility.

FINDINGS

A review of the records for preparedness and prevention indicated that Meyer's contingency plan did not contain the emergency coordinator's home address, and there was no evidence that the contingency plan had been submitted to the local hospital, police and fire departments. Review of the personnel training records indicated that Meyer did not have records of a training program that met the requirements of 35 Illinois Administrative Code (Title 35: Environmental Protection, Subtitle G: Land Pollution, Chapter I: Pollution Control Board), or the "regulations".

A tour of the facility was then initiated. During the tour of the process area we noted one unmarked 55-gallon drum of hazardous waste (spent paint/waste paint) in the satellite accumulation area. Meyer failed to mark the container with the words," Hazardous Waste" or with the words identifying the waste. We then went to the hazardous waste storage area where we noted that there was a no fire extinguisher outside of the hazardous waste storage area. Meyer failed to keep its facility equipped with the required emergency equipment.